

Baseline Change Request Log

BCR: 2002-031 Format-1 Update; 4.1.1-Fire Protection Emergency Response

Approval Date: 12/5/2002

Disapproved:

Approved With Conditions.

Description: The format-1 for 4.1.1-Fire Protection Emergency Response does not reflect the requirements of 2.X, which implements DOE O-420.1, including fire protection and fire department operations.

Recommended Action by the CRG: Accept changes as noted on redline format-1.

Justification: The revision of format-1 for 4.1.1-Fire Protection Emergency Response is required to ensure compliance with hazard category 2&3 non-reactor nuclear operation requirements for firefighters and paramedics accessing nuclear facilities

Cost Impact: Impact for FY03 will be 7,650 hours, which will be devoted to train firefighters and paramedic personnel. FY03 Nuclear Operations budget has been allocated for this effort. After an initial effort, reoccurring costs will be minimal.

Schedule Impact: None to other projects. Additional training is required in FY03 for Firefighter and Paramedics for new procedures regarding new nuclear operations response procedures.

Impact on the Work if Change Is Not Made: The inability to support nuclear category 2 & 3 facility operations.

The proposed changes affect Bechtel National (BN) and its effort to upgrade to non-reactor nuclear operations. A failed "Nuclear Operations Readiness Assessment" may result if the proposed changes are not incorporated by 3/30/03.

Other NTS contractors are not affected by the proposed changes.

Attachments: Redline format-1.

WBS: 4 1 1 Standard Number: National Fire Protection Association (NFPA) 1971

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WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1403
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1500
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1521
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1561
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1911
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1582
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1999
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1581
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1962
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1021
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1975
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1976
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1977
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1981
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1982
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1983

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WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1991
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1992
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1901
WBS: 4.1.1	Standard Number: Current, National Fire Codes (NFC)
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 471
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1221
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 473
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1041
WBS: 4.1.1	Standard Number: DOE O 420.1, Facility Safety, Section 4.2
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 414
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1003
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1002
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 1001
WBS: 4.1.1	Standard Number: 49 CFR 172.600
WBS: 4.1.1	Standard Number: DOE G 440.1-5, Fire Safety, Guide 9/30/95, EH
WBS: 4.1.1	Standard Number: National Fire Protection Association (NFPA) 472

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BCR: 2002-025 WSS-WBS, 2.4 Underground Operations, NV O 440.X, Underground Operations Safety and Health

Approval Date: 9/18/2002

Disapproved:

Description: This change is requested to both update the 2.4 WSS/WBS to reflect the standard being used and to update that standard by referencing NNSNNV Order 440.X, "Underground Operations Safety and Health" and its attached CRD.

Recommended Action by the CRG: Revise the Format 1 for WSS/WBS 2.4 per the attached revised Format 1 which includes the new NNSA/NV Order 440.X, "Underground Operations Safety and Health" and its CRD attachment.

Justification: As noted by Joe King et al in 2001, the standard for safety and health for underground operations that was being utilized at the NTS was not the WSS/WBS 2.4 referenced standard(29CFR1926.800) but NV-353, "The Nevada Test Site Underground Safety and Health Standards." Although NV-353 was not the referenced standard it was recommended in the section 5, implementation considerations of WBS 2.4. In the same time frame it was recognized by both NNSA/NV OPR for NV-353 and the Tri-lab Convened Group that this venerable standard was in need of major revision or replacement to bring it in line with a current national consensus standard. Maintenance efforts for NV-353 were time and resource consuming and frequently not performed in a timely manner. Some of the standards were outdated and there was no reasonable way to keep the standard current. A group was convened consisting of all stakeholders in NTS underground operations to review NV-353 and revise or replace. This BCR reflects the results of that groups activities.

Cost Impact: No cost impacts were identified during the initial review of this proposed change.

Schedule Impact: No schedule impacts were identified during the initial review of this proposed change.

Impact on the Work if Change Is Not Made: The impact of not making this change will not directly affect the work but will make it increasingly difficult to manage and enforce the safety and health requirements for underground operations. Already stretched resources will continue to be challenged to keep the standard updated to reflect changes in the referenced standards. Not making the change will also not be responsive to the recommendation of the 2001 assessment performed by Joe King et al.

Attachments: Revised Format 1 for WSS/WBS 2.4, NNSNNV draft Order 440.X, "Underground Operations Safety and Health."

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WBS: 2.4 **Standard Number:** 29 CFR 1926.800

WBS: 2.4 **Standard Number:** NV O 440.X, CRD

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BCR: 2002-024 3.8.1-Power: Update format 1 and standards

Approval Date: 9/18/2002

Disapproved:

Description: (a) One listed standard is no longer applicable and should be deleted (State of California General Order No. 95 Overhead Line Construction).

(b) Section 5 listed 3 documents as guides, 2 of which are actual standards and should be listed in Section 3. The 3rd need not be specifically listed as any available "guide" is a candidate for "guidance."

(c) Due to an update of a consensus standard the format-1 needs to be revised to reflect the current edition of the outdated consensus standard. Additionally, to precluded continuous revision of the format-1 to address changing editions a note is proposed following the Section 3 header indicating "The latest version/Edition of the listed standard are used unless otherwise specified by the authority having jurisdiction."

(d) Recommend deleting the specific number of times training will be offered, as it is offered as needed.

(e) All organizations doing electrical utilities design and electrical utilities work will be affected by these changes.

Justification: It's expected that state & local regulations and codes will eventually invoke the latest edition of the NESC and other consensus standards. The changes proposed provide for the ongoing orderly change of these standards with minimal administrative burden to maintain this format-1.

Cost Impact: Insignificant.

Schedule Impact: Insignificant.

Impact on the Work if Change Is Not Made: The WSS will reflect an outdated standard, creating conflict between the contracts and standards invoked by state and local electrical utilities codes.

Attachments: Redline format-1.

WBS: 3.8.1 Standard Number: ANSI C2-2002

WBS: 3.8.1 Standard Number: State of California General Order No. 95

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BCR: 2002-023 **Administrative addition of cross-reference in 2.1.7-Radioactive Waste format-1 to newly added WSS WBS 2.X-Hazard Category 2 & 3 Non-Reactor Nuclear Facilities**

Approval Date: 9/18/2002

Disapproved:

Description: (a) To reflect the applicability of the newly approved 2.X-Hazard Category 2 & 3 Non-Reactor Nuclear Facilities Standards to the 2.1.7-Radioactive Waste work activity, an administrative change is recommended to Section 1.B paragraph 6, adding 2.X-Hazard Category 2 & 3 Non-Reactor Nuclear Facilities to the list of other WSS work activities that are applicable to 2.1.7-Radioactive Waste.

(b) Organizations affected are those performing the work activity described in Section 1 of the 2.1.7-Radioactive Waste format-1.

(c) This is an administrative change only that neither imposes new requirements nor provides relief from existing requirements.

Recommended Action by the CRG: Approve changes as proposed.

Justification: Change needed to clarify relationship of newly added WSS 2.1.7-Radioactive Waste.

Cost Impact: None.

Schedule Impact: None.

Impact on the Work if Change Is Not Made: If change is not made the relationship of 2.X to 2.1.7 will not be as clear to all WSS readers as it could be.

Attachments: Redline version of revised paragraph.

WBS: 2.1.7 **Standard Number:**

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BCR: 2002-022 Review and update of NNSA/NV WSS for Non-Nuclear Explosives Operations and Safety

Approval Date: 8/20/2002

Disapproved:

Description: In accordance with the charter for Explosives Operations & Safety, approved by the NNSA/NV CRG Chairman on April 4, 2002 Bechtel Nevada (BN) conducted a review of all the explosives operations it manages which does not include nuclear explosives activities. As prescribed by the charter BN has prepared a format-1 for the new work not currently addressed by the NNSA/NV WSS and is recommending changes to a few format-1 s for work already covered by the NNSA/NV WSS. The work activities reviewed and their related WSS WBS are as follows: 2.3-Surface Mining; 2.4-Underground Construction; 2.8-Construction; 2.13-Military Munitions; 3.12-Explosives Storage; new format-1 2.14-Counter Terrorism Operations Support (CTOS) Explosive Operations and Safety. No changes are recommended for 2.3-Surface Mining or 2.4-Underground Construction. Minor change are recommended for 2.8- Construction; 2.13-Military Munitions; 3.12-Explosives Storage, and 21 new format-1 is recommended for the new Counter Terrorism Operations Support (CTOS) Explosive Operations, recommended operational WBS No. 2.14.

Bechtel Nevada is the only contractor expected to experience any impact as a result of the proposed changes.

Justification: New work involving non-nuclear explosives at NNSA/NV requires standards be established for it. Existing work at NNSA/NV involving non-nuclear explosives had not been reviewed and updated since the 1996-1998 time frame.

Cost Impact:. None identified.

Schedule Impact: None identified.

Impact if Change is not made: All work conducted at NNSA/NV will not be addressed by contract specified standards; the approved standards for some work already addressed by the NNSA/NV WSS may not be as clear as desired in regards to non-nuclear explosives.

Recommendation: Approve the changes as recommended.

Cost and schedule impacts and implementation considerations. No cost or schedule impacts identified. Implementation considerations noted in , Section 5 of the format-1s.

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Attachments:

Attachment 1: Redline copies of the following format-1 denoting recommended changes: 2.8-Construction; 2.1 3-Military Munitions; 3.1 2-Explosives Storage; 2.1.8- Waste Explosives Disposal

Attachment 2: New format-1 for 2.14- Counter Terrorism Operations Support (CTOS) Explosive Operations and Safety.

WBS: 2.14 **Standard Number:** United States Navy NAVSEA SW060-AA-010

WBS: 2.14 **Standard Number:** United States Army Field Manual 5-250

WBS: 2.14 **Standard Number:** DOE M 440.1-1, Pantex version

WBS: 2.8 **Standard Number:** 29 CFR 1910.109

WBS: 2.8 **Standard Number:** 29 CFR 1926, Subpart T

WBS: 2.8 **Standard Number:** 29 CFR 1926, Subpart U

WBS: 3.12 **Standard Number:** DOE M 440.1-1

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BCR: 2002-021 Real Estate and Operation Permit Manual

Approval Date: 9/18/2002

Disapproved:

Description: This BCR transmits a CRD for NV M 412.X1C, a revised NV Manual addressing use of land and facilities for operations on the Nevada Test Site.

Recommended Action by the CRG: This CRD establishes requirements for use of land and facilities to conduct operations the Nevada Test Site, Mercury, NV, and North Las Vegas Facilities in Las Vegas, NV.

Justification: This Order establishes requirements to conduct operations utilizing real estate and land at the Nevada Test Site and the North Las Vegas Facilities in Las Vegas, NV.

Cost Impact: There will be a cost impact for training required by the Order. See below.

Schedule Impact: This Order should have no schedule impact.

Impact on the Work if Change Is Not Made: Inconsistency in processing and tracking of the operations conducted on the Nevada Test Site and the North Las Vegas Facilities and land.

Attachments: NV M 412.X1C is attached.

Cost Impact. Training will be required by the Program/Project/Functional Managers.

WBS: N/A

Standard Number: NV M 412.X1C, CRD

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BCR: 2002-019 Nevada Test Site Access and Area Control

Approval Date: 8/15/2002

Disapproved:

Description: This BCR transmits a CRD for NV O 450.X, a new NV order addressing access and area control at the NTS.

Recommended Action by the CRG: This CRD establishes requirements for NTS users entering the NTS and for those conducting activities outside fixed facilities in the forward areas of the NTS.

Justification: This order establishes general requirements for access and area control for Mercury and the forward areas of the NTS and specific requirements for remote and controlled areas of the NTS.

Cost Impact: There will be a cost impact for training required by the order. See below.

Schedule Impact: This order should have no schedule impact.

Impact on the Work if Change Is Not Made: Training requirements are not being addressed in a cost effective manner. Specific training requirements, such as those required for entry into hazardous areas of the site, could avoid employee injury or death.

Attachments: NV O 450.X is attached.

Cost Impact. The training required by this order - first aid and CPR - is already offered by NTS contractors. More personnel may need to take the courses. Organizations sending personnel solo into remote areas to perform work are in violation of OSHA requirements. There may be costs involved when organizations comply with this order, but these costs can likely be lessened by improved internal coordination.

WBS: 1.8 Standard Number: NV O 450.X

WBS: B2 Standard Number: NV O 450.X

WBS: B3 Standard Number: NV O 450.X

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BCR: 2002-018 NV Work Smart Standard (WSS) 3.6.a Transportation (Labs)

Approval Date: 6/19/2002

Disapproved:

Description: Remove reference to NV-356, "Hazardous Material On-Site Transportation Safety Manual, NTS," from Section 5 of WSS. This reference document no longer exists.

Recommended Action by the CRG: By acceptance of this proposed change request: a WSS will no longer provide a non-existent reference to performing onsite transport.

Justification: NV-356 references a deviation process that is no longer recognized as compliant to current DOE/NNSA Orders.

Cost Impact: Cost Impacts are not know at this time.

Schedule Impact: Schedule improvement or slippage as a result of the requested change are not known at this time.

Impact on the Work if Change Is Not Made: Inconsistent implementation of transportation, transfer, and packaging requirements.

Attachments: None.

WBS: 3.6.a Standard Number: NV-356

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BCR: 2002-017 NV O 350.1, Contractor Human Resource Management Programs

Approval Date: 6/19/2002

Disapproved:

Description: This Order establishes the roles, responsibilities, and lines of communications in the event of the possibility or likelihood of a labor strike, establishment of a picket line, or unexpected job action that has the potential to disrupt programmatic operations at the Nevada Test Site.

Recommended Action by the CRG: Approval of the Contractor Requirements Document for incorporation into the BN contract.

Justification: On December 11, 2001, two DoD contractor employees formed a picket line outside Gate 100. This action resulted in a work stoppage on the NTS. Programmatic activity was impacted. There were no established lines of communication nor a central clearinghouse for information regarding labor issues. As a result the appropriate NNSA/NV and BN program managers were not informed of the potential for disruption. This Order establishes the roles and responsibilities to mitigate adverse impact should a similar situation presents itself in the future.

Cost Impact: No cost impact to implement the Order, however, significant cost impact of the Office is caught unaware.

Schedule Impact: Can be significant if a similar situation as described above recurs and information is not coordinated and disseminated to those that need to know.

Impact on the Work if Change Is Not Made: There are no established lines of communication nor a clearinghouse for labor relations information that may impact or disrupt programmatic operations. If the Order is not adopted, both NNSA/NV and BN could be caught off-guard again and face another adverse impact on operations because of poor coordination and dissemination of information.

Attachments: NV O 350.1, Contractor Human Resource Management Programs.

WBS: 1.1.7 Standard Number: NV O 350.1

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BCR: 2002-016 NV O 350.2, Use of Facility Contractor Employees for Services to DOE in the Washington, D.C., Area

Approval Date: 6/19/2002

Description: This NV Order clarifies the procedures to be used within NNSA/NV for the management of contractor employees assigned to support DOE/HQ and DOE/NNSA in the Washington, D.C., area for more than 30 continuous calendar days.

Disapproved:

Recommended Action by the CRG: Approval of the Contractor Requirements Document for incorporation into the BN contract.

Justification: DOE O 350.2 requires that all DOE elements and facility contractors comply with the provisions of the Order. The NV Order defines how NNSA/NV and BN will comply by outlining the policy and procedures to follow when responding to a request to provide contractor employees to support a DOE/HQ or DOE/NNSA program office.

Cost Impact: Significant cost impacts if a contractor employee is assigned to the Washington, D.C., area without first assuring that the request is within the Headquarters program offices' staffing plans and budget.

Schedule Impact: The lack of local procedures has resulted in delays in responding to DOE/HQ requests.

Impact on the Work if Change Is Not Made: Currently, there is no written policy or procedure outlining how requests for contractor personnel is to be accomplished. As a result there is confusion and delays in responding to requests. If the NV Order is not adopted there will be continued delays in responding to requests which may impact cost and schedules.

Attachments: NV O 350.2, Use of Facility Contractor Employees for Services to DOE in the Washington, D.C., Area.

WBS: 1.1.1 Standard Number: DOE O 350.2

WBS: 1.1.1 Standard Number: NV O 350.2

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BCR: 2002-015 DOE O 440.2A, Aviation Management and Safety, and CRD

Approval Date: 9/18/2002

Disapproved:

Description: Replaces DOE Order 440.2, "Aviation" and its Contractor Requirements Document (CRD) with DOE Order 440.214, "Aviation Management and Safety" and its CRD of. Imposes requirements for reporting that is required for NV to meet its requirements under the order. BN currently complies with the requirements but there is no document connecting the compliance with the new DOE requirements as required by ISM.

Recommended Action by the CRG: By acceptance of the proposed change request, the contractor will be required to perform to the above CRD while flying, maintaining, training, and reporting on the NV owned aircraft.

Justification: The incorporation of DOE Order 440.2A establishes safe, consistent implementation of the Federal Aviation Regulations (FAR). It also imposes requirements that provides for standards that more closely emulate those of the airlines which are more safety oriented than those for general aviation. The FARs are the minimum requirements which the aviation section is required to comply.

Cost Impact: The cost impact will be negligible since BN has voluntarily complied with this order and its predecessor, 440.2, "Aviation". The requirements are incorporated into the RSL Aviation Services Operations Manual and other company procedures.

Schedule Impact: None

Impact on the Work if Change Is Not Made: If not made, the requirements and restriction would have to be incorporated in detail into the task plans to ensure the providing of the data necessary for reporting and to ensure the level of safety required by DOE. The Aviation Program will not comply with all parts of ISM.

Attachments: DOE Order 440.2A "Aviation Management and Safety" & CRD

WBS: 3.3

Standard Number: DOE O 440.2A, CRD

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BCR: 2002-014

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Approval Date:

Disapproved:

WBS:

Standard Number:

BCR: 2002-013 DOE O 151.1A, Comprehensive Emergency Management System

Approval Date: 5/15/2002

Disapproved:

Description: This BCR transmits the revision to the CRD for DOE O 151.1 to bring this Directive into compliance with the National Nuclear Security Administration (NNSA), and to update organizations titles.

Recommended Action by the CRG: Approve the BCR since the changes are administrative in nature and did not change the requirements for contractors.

Cost Impact: There is no cost impact for this proposed change.

Schedule Impact: There is not schedule impact for this proposed change.

Impact on the Work if Change Is Not Made: None.

Attachments: DOE O 151.1A

WBS: 4 8

Standard Number: DOE O 151.1A, CRD

WBS: B2

Standard Number: DOE O 151.1A, CRD

WBS: B3

Standard Number: DOE O 151.1A, CRD

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BCR: 2002-012 New WBS 2.X (Operational WBS) Hazard Category 2 & 3 Non-Reactor Nuclear Facilities

Approval Date: 3/28/2002

Disapproved:

Description: With the expanded scope-of-work planned for the Waste Examination Facility it was recognized that the current WSS and B Lists did not address all of NNSA/NV's work associated with nuclear facilities. To remedy this deficiency a SIT was chartered by the CRG. Considering the current effort by the Super SIT to address all laboratory work and the existence of the B2 and B3 list which, address requirements for activities which were excluded from the N&S closure process, e.g., Nuclear Device Assembly/Disassembly, Energetic Experiments with Special Nuclear Materials (sub critical experiments), Nuclear Explosive Safety, Safeguards and Security of SNM, and the DAF, this SIT has limited the work scope activity to be defined by this WBS element to "construction, operation, management, support, and decommissioning of the hazard category 2 and 3 non-reactor nuclear facilities." Based on this work activity description and in consideration of the active directives of interest to the Defense Nuclear Facilities Safety Board (DNFSB), the SIT has developed the attached format-1 for CRG review.

This format-1 includes those standards that are, with few exceptions, unique to the facilities described in Section 1 of the format-1. Applicable WSS not unique to the covered facilities are found and cited in many of the other WSS format-1s and will be brought into play through the application of the appropriate WSS WBSes. The interface with other WSS WBSes has been emphasized in Section 1 of the format-1. It is the application of all relevant WSS WBSes that comprehensively address a given work activity such as that described in Section 1, Work Activity.

All the active directives of interest to the DNFSB were evaluated for applicability and adoption. All that were deemed appropriate were not included in this format-1 as many of them were included elsewhere in the WSS and are not exclusively applicable to nuclear facilities. Those not applicable to this work activity were also not included in the format-1.

Recommended Action by the CRG.

- 1. The SIT recommends approval of the addition of a new WSS WBS and format-1 addressing a specific set of nuclear facilities, see Section 1 of the format-1.*
- 2. The SIT recommends the CRG charter a SIT to address nuclear facility standards for "less than hazard category 3 nuclear facilities."*
- 3. The SIT also recommends the CRG charter a broad review of a number of directives of interest to the DNFSB,*

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the application of which clearly extends beyond nuclear facilities or are already being implemented but are not reflected in the WSS. These directives are listed in the continuation sheet. The directives, included in this format-1, and later adopted to an overarching WBS should be removed from this format-1 at that time to reduce unnecessary/confusing redundancy. Other reviews are recommended to eliminate the standards conflicts between the WBSes specified. The basis for these additional reviews is also explained on the continuation sheet.

4. The SIT also recommends that the CRG approve the changes to the current WSS as described in the continuation sheet to eliminate standards conflicts between this format-1 and two existing WBSes, 2.1.7-Radioactive Waste and 2.12-Hazard Assessment.

Justification. The current WSS does not address all the hazard category 2 and 3 non-reactor nuclear facilities that exist or are planned for NNSA/NV.

Cost Impact. Summarize significant cost impacts associated with proposed change (positive or negative).

Believed to be significant. See format-1, Section 5, Implementation Considerations, for description of the factors resulting in the significant negative cost impact.

Cost impacts will be determined through the preparation of the nuclear operations implementation plan.

Schedule Impact. Believed to be significant.

Schedule impacts will be determined through the preparation of the nuclear operations implementation plan.

Impact on the Work if Change Is Not Made. The mandatory legal requirements regarding nuclear facility Safety Basis Requirements will not be included/acknowledged in WSS and NNSA/NV's contracts (10 CFR 830 Subpart B, Safety Basis Requirements) and, the extra rigor and increased safety/risk reduction expected at DOE NNSA selected hazard category 2 and 3 non-reactor nuclear facilities will not be contractually prescribed.

Attachments. Format-1 and Format-2, Issues Resolution Document and Signature Page, indicating SME and Independent Reviewer concurrence. Format-1 for new work activity, redline format-1 for 2.12-Hazard Assessment with recommended deletions to address standards conflicts.

Active directives of interest to the DNFSB:

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The below directives of interest to the DNFSB have been included in the format-1. The SIT recognizes their application beyond this work activity and recommends the CRG charter a formal review to determine their appropriateness for addition to other overarching WSS WBSes.

DOE O 420.1, Chg 3, Facility Safety

DOE O 440.1A, Worker Protection Management for DOE Federal and Contractor Employees

DOE O 5480.19, Chg 1, Conduct of Operations Requirements for DOE Facilities

The below directives of interest to the DNFSB were not included in the format-1. The SIT recognizes their application beyond this work activity and recommends the CRG charter a formal review to determine their appropriateness for addition to other overarching WSS WBSes.

DOE O 470.2A, Security and Emergency Management Independent Oversight and Performance Assurance Program

DOE O 474.1A, Control and Accountability of Nuclear Materials

DOE O 5632.1C, Protection and Control of Safeguards and Security Interests.

DOE M 5632.1C-1, Protection and Control of Safeguards and Security Interests

DOE O 252.1, Technical Standards Program

Recommendations Regarding Current WSS

The below recommendations relative to the current WSS are being made to eliminate standards conflicts and address the appropriate breadth of application of a given directive.

DOE Order 5480.23 Nuclear Safety Analysis Reports

To eliminate a standards conflict between this format-1 and the format-1 for Radioactive Waste, 2.1.7, recommend deleting this Order from 2.1.7-Radioactive Waste. This order was cancelled on 01/09/02 by DOE N 251.42 because 10 CFR 830 Subpart B, Safety Basis Requirements, now addresses the order's subject/requirements. 10 CFR 830, Subpart B is included in this nuclear facility format-1, which will overlap onto 2.1.7 facilities whenever a radioactive waste management facility is categorized as a "hazard category 2 and 3 non-reactor nuclear facility" as described in this format-1.

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2.12 – Hazard Assessment

To eliminate a standards conflict between this format-1 and the format-1 for Hazard Assessment, 2.12, recommend deleting from the 2.12-Hazard Assessment format-1, all 10 CFR citations and all narratives addressing nuclear facility hazard assessment and related issues. The 2.12-Hazard Assessment format-1 needs to be limited to hazard assessment for non-nuclear facilities/activities. With changes as recommended above in combination with the inclusion of 10 CFR 830 Subpart B, Safety Basis Requirements, in this format-1, the issue of hazard assessment for industrial facilities/activities and specific hazard category 2 and 3 non-reactor nuclear facilities would be addressed by the two WBSes. (See attached redline 2.12-Hazard Assessment format-1 indicating recommended deletions to address the noted conflicts.)

WBS: 2.1.7	Standard Number: DOE O 5480.23
WBS: 2.12	Standard Number: 10 CFR 61.16
WBS: 2.12	Standard Number: 10 CFR 70.32(i)
WBS: 2.12	Standard Number: 10 CFR 70.23(a)(3) and (4)
WBS: 2.12	Standard Number: 10 CFR 70.22(g)(1), 70.22(h)(1), and 70.22(i)
WBS: 2.12	Standard Number: 10 CFR 70.22(a)(7) and (8)
WBS: 2.12	Standard Number: 10 CFR 30.32(i)(1)
WBS: 2.12	Standard Number: 10 CFR 61.13
WBS: 2.12	Standard Number: 10 CFR 61.55
WBS: 2.12	Standard Number: 10 CFR 61.51(a)(4), (5), and (8)
WBS: 2.12	Standard Number: 10 CFR 61.53(b)

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WBS: 2.12	Standard Number: 10 CFR 70.24
WBS: 2.12	Standard Number: 10 CFR 61.56
WBS: 2.X	Standard Number: 10 CFR 830
WBS: 2.X	Standard Number: DOE O 5480.20A Chg 1
WBS: 2.X	Standard Number: NV M 450.XA Chg 1
WBS: 2.X	Standard Number: DOE O 440.1A, CRD
WBS: 2.X	Standard Number: DOE O 425.1B, CRD
WBS: 2.X	Standard Number: DOE O 433.1, CRD
WBS: 2.X	Standard Number: DOE O 5480.19 Chg 2
WBS: 2.X	Standard Number: DOE O 420.1 Chg 3, CRD

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BCR: 2002-011 WBS 1.8 Administrative Systems and Controls, NNSA/NV Directives System

Approval Date: 3/28/2002

Disapproved:

Description: This change request proposes that NNSA/NV M 251.1-1B, Contractor Requirements Document (CRD) be adopted as NNSA/NV Work Smart Standards. Since the associated requirements are administrative in nature, these requirements are proposed to be added to WBS element 1.8, Administrative Systems and Controls and List B2.

The CRD, Attachment 1, to NNSA/NV M 251.1-1B, provides NNSA/NV process. Contractor participation provides opportunity for interaction with the DOE, NNSA and NNSA/NV Directives development processes where CRDs are attached to directives may be made more acceptable for incorporation into contracts, where appropriate. Performance Based Management Contracts contain DEAR Clause 970.5204-78 which specifies the need for the NNSA/NV contractor be provided the opportunity to assess the impact of Department Directives prior to contract modification.

Recommended Action by the CRG: By acceptance of this proposed change request:

- A. DOE/NV M 251.1-1A will be deleted from the BN and WSI contracts (List B2).*
- B. NNSA/NV M 251.1-1B, CRD will be added to WSS WBS element 1.8 and List B2.*
- C. The Format 1, for WBS element 1.8 will be revised as follows:*
 - Section 3. Standards list should include NNSA/NV M 251.1-1B, NNSA/NV Directives Systems Manual.*

Justification: DOE, NNSA, DOE/NV and NNSA/NV supplemental directives are the ultimate set of internal enduring documents used to communicate DOE, NNSA and NNSA/NV policy, requirements, and processes to federal employees, and includes Contractor Requirements Documents, where appropriate. Participation from all affected entities encourages teamwork and a win win in establishing interfacing requirements and process controls.

Cost Impact: None.

Schedule Impact: None.

Impact on the Work if Change Is Not Made: Without this change, the contractors would not be expected to help ensure Directives, DOE and NNSA expectations are communicated to all programmatic activities.

Baseline Change Request Log

Attachments: Copy of draft NNSA/NV M 251.1-1B.

WBS: 1 8 **Standard Number:** NV M 251.1-1B, CRD

WBS: B2 **Standard Number:** NV M 251.1-1B, CRD

WBS: B2 **Standard Number:** NV M 251.1-1A

Baseline Change Request Log

BCR: 2002-010 NV Work Smart Standards Manual 450.3XB

Approval Date: 5/15/2002

Disapproved:

Approved With Conditions: Page 8, 7c, change B2 to B3.

Description: Revise the Work Smart Standards (WSS) Manual 450.3XB to reflect a restructuring of the current WSS process.

Recommended Action by the CRG: The revision was reviewed and approved by the CRG January 15, 2002.

Justification: Non-ES&H Laws and Regulations were placed in WSS only for reference convenience. Since they are binding on all contractors, they will be added to the NNSA/NV contract(s) List A.

Cost Impact: None.

Schedule Impact: None.

Impact on the Work if Change is Not Made: None.

Attachments: Work Smart Standards Manual 450.3XB.

WBS: 1.8 Standard Number: NV M 450.3XB

WBS: B2 Standard Number: NV M 450.3XB

WBS: B3 Standard Number: NV M 450.3XB

BCR: 2002-009

Approval Date:

Disapproved:

TABLED - NO HARD COPY.

WBS: Standard Number:

Baseline Change Request Log

BCR: 2002-008 Nevada Test Site Access and Area Control

Approval Date:

Disapproved: 5/17/2002

Description: This BCR transmits a CRD for NV O 450.X, a new NV order addressing access and area control at the NTS.

Recommended Action by the CRG: This CRD establishes requirements for NTS users entering the NTS and for those conducting activities outside fixed facilities in the forward areas of the NTS.

Justification: This order establishes general requirements for access and area control for Mercury and the forward areas of the NTS and specific requirements for remote and controlled areas of the NTS.

Cost Impact: There will be a cost impact for training required by the order. The training required by this order - first aid and CPR - is already offered by NTS contractors. More personnel may need to take the courses.

Organizations sending personnel solo into remote areas to perform work are in violation of OSHA requirements. There may be costs involved when organizations comply with this order, but these costs can likely be lessened by improved internal coordination.

Schedule Impact This order should have no schedule impact.

Impact on the Work if Change Is Not Made: Training requirements are not being addressed in a cost effective manner. Specific training requirements, such as those required for entry into hazardous areas of the site, could avoid employee injury or death.

Attachments: NV O 450.X is attached.

WBS: N/A

Standard Number: NV O 450.X, CRD

Baseline Change Request Log

BCR: 2002-007 **NNSA/NV NTS Range and Airspace Management, NV O 413.X1 - Contractor Requirements Document**

Approval Date:

Description: This BCR transmits a CRD for NV O 413.X1, a new NV order addressing management of range and airspace at the NTS.

Disapproved: 5/17/2002

Recommended Action by the CRG: The CRD establishes requirements for the contractor to exercise project management of military WFO projects and to manage NTS ranges used by military customers. It also establishes airspace requirements.

Justification: This order and associated CRD is required to establish control of military WFO projects and to ensure safety and environmental issues are addressed.

Cost Impact: There will be a cost impact to our military WFO customers, but a savings to NNSA/NV. Under this order, our military WFO customers will bear the costs of range safety and maintenance, as required by NV O 481.1, Work for Others (Non-Department of Energy Funded Work). A monetary savings to NNSA/NV will accrue, and Integrated Safety Management System requirements will be met.

Schedule Impact: This order should have little schedule impact.

Impact on the Work if Change Is Not Made: There will be a significant impact because oversight responsibilities for, and coordination of, military WFO range operations and airspace activities in general at the TNS are not currently addressed.

Attachments: NV O 413.X1 is attached.

WBS: N/A **Standard Number:** NV O 413.X1, CRD

Baseline Change Request Log

BCR: 2002-006 Applicability Clarification: DOE O 435.1 Radioactive Waste Management

Approval Date: 3/28/2002

Disapproved:

Description: The absence of DOE O 435.1, Radioactive Waste Management from the NV Work Smart Standards (NV-WSS) is a continuing point of confusion. The order's implementation through NNSA/NV M 435.1-1, Radioactive Waste Management Manual is not being recognized and acknowledged. NNSA/NV M 435.1-1, was added to the NV-WSS in August 2000 under WBS 2.1.7-Radioactive Waste. A single clarifying note under the citation of NNSA/NV M 435.1-1 CRD Radioactive Waste Management in Section 3 - Standards of WBS 2.1.7 will permanently remedy this problem.

Recommended Action by the CRG: Approve this administrative change, the addition of a clarifying note, as illustrated on the attached Format 1.

Justification: NNSA/NV M 435.1-1 CRD was written to take from DOE O 435.1 only those requirements needed by NNSA/NV as defined in WBS 2.1.7., Section 2 - Management Issues b and d. NNSA/NV M 435.1-1 was then judged to be complete for the needs of radioactive waste management at NNSA/NV. If clarification in the NV-WSS documentation is needed, the proposed change to the WBS 2.1.7 Format 1 provides this clarification.

Cost Impact: N/A

Schedule Impact: N/A

Impact on the Work if Change Is Not Made: Confusion will continue regarding the mechanism by which DOE O 435.1, Radioactive Waste Management is applied to NNSA/NV contractors.

Attachments: None. See proposed change below.

Current citation:

DOE/NV M 435.1-1 CRD Radioactive Waste Management

Note: Addresses life-cycle planning for the generation, storage, treatment, and disposal of Radioactive Waste. Management Issues b, and d.

Proposed change:

DOE/NV M 435.1-1 CRD Radioactive Waste Management

Baseline Change Request Log

Note: Addresses life-cycle planning for the generation, storage, treatment, and disposal of Radioactive Waste. Management Issues b, and d. DOE O 435.1, Radioactive Waste Management is implemented through the NNSA/NV 435.1-1, Radioactive Waste Management Manual. Contractors and NTS users meet the requirements of DOE O 435.1 through conformance with NV M 435.1-1.

WBS: 2.1.7 **Standard Number:** NV M 435.1-1, CRD

BCR: 2002-005

TABLED - NO HARD COPY.

Approval Date:

Disapproved:

WBS: **Standard Number:**

Baseline Change Request Log

BCR: 2002-004 Updating NNSA/NV Nuclear Explosives Directives NV O 452.1B and NV O 452.2B

Approval Date: 3/6/2002

Disapproved:

Description: This change proposes the replacement of two NVO Directives with the current NVO Directives on List B2 and B3 as identified below:

NV O 452.1B, Nuclear Explosive and Weapon Surety Program, dated xx/xx/2002

NV O 452.2B, Safety of Nuclear Explosive Operations, dated xx/xx/2002

These Directives replace NVO 452.1A and NVO 452.2A as currently listed on List B2 and B3.

This change affects BN and WSI NV contracts and agreements with DOE/AL and DOE/OAK regarding requirements applicable to LLNL, LANL, and SNL when conducting work under the purview of NNSA/NV.

Recommended Action by the CRG: By accepting this BCR, the two B revisions to the directives identified above will be inserted in place of the existing A revisions, thereby updating List B2 and B3 as applicable to contracts and agreements.

Justification: This action is to ensure contracts and agreements mandate application of current NNSA/NV Directives regarding nuclear explosives.

Cost Impact: Cost impacts are not anticipated to be significant regarding this BCR.

Schedule Impact: Schedule impacts are not anticipated to be significant regarding this BCR.

Impact on the Work if Change Is Not Made: Without making this change, the most current NNSA/NV requirements would not be mandated in contracts and agreements.

Attachments: NNSA/NV Orders 452.1B and 452.2B are available on the web at explorer.

WBS: B2 Standard Number: NV O 452.2B

WBS: B2 Standard Number: NV O 452.1B

WBS: B3 Standard Number: NV O 452.2B

Baseline Change Request Log

WBS: R3

Standard Number: NV O 452.1B

Baseline Change Request Log

BCR: 2002-003 Revision to NNSA/NV Oversight Management System, NV-220.XA - Contractor Requirements Document

Approval Date: 1/15/2002

Disapproved:

Description: This BCR transmits the revision to the CRD for the NV M 220.XB revision which deletes the first section of the existing CRD. This section refers to the Business Management Oversight Program which has been a stand-alone program. The CRD requires contractors and users to make available assessments schedules and copies of assessments as requested by NNSA/NV.

Recommended Action by the CRG: The changes to the CRD consist of the deletion of the BMOP requirements. There is no change in the requirement for contractors and users to provide assessment schedules and reports to NNSA/NV.

Justification: The inclusion of the BMOP in the 220 process is redundant. Although the BMOP has been discontinued AMBFS and their headquarters counterparts are retaining and refining oversight processes that will ensure continuing evaluation of both NNSA/NV and contractor/user performance in the area of business programs.

Cost Impact: There is no cost impact of this proposed change.

Schedule Impact: There is no schedule impact of this proposed change.

Impact on the Work if Change Is Not Made: There will be a significant impact because the revised NV M 220.XB incorporates changes recommended by headquarters ISM implementation reviewers last fall. Although the CRD is a minor component of the revised directive, it should reflect the current reality of our oversight efforts.

Attachments: Attached are both the current CRD from NV M220.XA and the proposed CRD from NV M 220.XB.

WBS: 1 8 **Standard Number:** NV M 220.XB, CRD

WBS: B2 **Standard Number:** NV M 220.XB, CRD

WBS: B3 **Standard Number:** NV M 220.XB, CRD

Baseline Change Request Log

BCR: 2002-002 Additional Management Standards for Asset Management, 1.3.6 Asset Management

Approval Date: 12/12/2001

Disapproved:

Description: This change provides for an expanded and clarified scope of activities, management issues, and standards as shown on the proposed new Format 1 (see line in/line out version).

The following changes to standards are proposed to be included in the new Format 1, Section 3, Standards, to fulfill the scope of activities as clarified and address the additional management issues identified:

NEW STANDARDS:

- 1) DOE 413.3, CRD, Program and Project Management for the Acquisition of Capital Assets, dated October 13, 2000.
- 2) NV O 413.X, CRD, Project Management Principles and Practices, dated October 24, 2001.

CHANGES TO EXISTING DOE/NV LISTED WSS:

- 1) Deletion of certain portions of DOE O 430.1A, CRD, as defined and canceled by DOE O 413.3

NV O 413.X defines how the project management requirements contained in DOE O 413.3 should be applied to DOE O 413.3 projects and designated activities. Designated activities are activities that can be managed using tailored principles and practices from DOE O 413.3, and have a responsible federal individual that controls at least two out of the three facets of project management (cost, scope, and schedule). NV O 413.X also contains the process for the NNSA/NV Energy Systems Acquisition Advisory Board (ESAAB) Equivalent which is used to review requests for Critical Decisions and baseline changes for DOE O 413.3 projects when the Acquisition Executive authority has been delegated to the NNSA/NV Manager.

Applicability of this Format 1 will be as directed by the Contracting Officer for the NNSA/NV contract, or the Manager NNSA/NV, for other Agreements, as follows:

- Performance Based Management Contractor (currently BN)
- Environmental Management Support Contractor (currently IT)
- Security Services Contractor (currently WSI)

Recommended Action by the CRG: By acceptance of this BCR, the proposed new Format 1, attached, will serve as the NNSA/NV complex-wide WSS for WBS 1.3.6, Asset Management.

Baseline Change Request Log

Justification: The current WSS does not define how DOE O 413.3 should be implemented at NNSA/NV, applies only to DOE O 413.3 projects, and applies only to the Performance Based Management and Security Services contractors. A Program Secretarial Officer has already delegated Acquisition Executive authority to the NNSA/NV Manager for one DOE O 413.3 project. Therefore, under DOE O 413.3, a local ESAAB Equivalent process is required. NV O 413.X will reduce uncertainty and provide further direction to the NNSA/NV complex on the application of DOE O 413.3, and will provide a degree of uniformity on the application of project management principles and practices within the complex.

Cost Impact: There are expected to be minor cost impacts when DOE O 413.3 projects and designated activities are executed under this order. NV O 413.X permits a tailored approach which should serve to mitigate its impact on smaller, less complex, and less risky projects and designated activities. In many cases, the principles and practices described are already being followed. NV O 413.X will allow NNSA/NV to avoid requesting additional funding through better planning, and will allow the contractor to deliver better organized and professional project management services to NNSA/NV. The cost to implement the above standards is not expected to be in contention for existing ongoing projects, nor for future projects currently in the budget process.

Schedule Impact: There are expected to be minor schedule impacts when DOE O 413.3 projects and designated activities are executed under this order. NV O 413.X permits a tailored approach which should serve to mitigate its impact on smaller, less complex, and less risky projects and designated activities. The accountability aspects in the O 413.3 may substantially reduce inadvertent schedule slippages regardless of the causative factors.

Impact on the Work if Change is Not Made: Without this order, there is no assurance that NNSA/NV's capital asset management systems would be capable of controlling certain projects in a manner which meets OMB Circulars, NNSA, DOE/HQ, and Acquisition Executive expectations, including project management and financial progress (earned value) status reporting.

Attachments: Attached is a new proposed Format 1, WBS 1.3.6, ASSET MANAGEMENT, red line in/ line out version. An electronic copy of the 70-page NNSA/NV O 413.X is included with this request.

WBS: 1.3.6 **Standard Number:** DOE O 430.1A, CRD

Baseline Change Request Log

WBS: 1.3.6 **Standard Number:** NV O 413.X, CRD

WBS: 1.3.6 **Standard Number:** DOE O 413.3, CRD

BCR: 2002-001 Event Notifications

Approval Date: 11/28/2001

Description: New process for ensuring key NV senior managers are aware of events (incidents, occurrences, emergencies).

Disapproved:

WBS: 2.10 **Standard Number:** NV N 232.XA, CRD

Baseline Change Request Log

BCR: 2001-021 **Update format-1 for 1.5.5 - Scientific and Technical Information to reflect current work activity, conditions, and applicable standards**

Approval Date:

BCR NOT RESOLVED - DO NOT CHANGE WBS 1.5.5.

Disapproved:

Description: Corrections are needed to the format-1 for 1.5.5 - Scientific and Technical Information to accurately reflect the work activities, issues, considerations and applicable standards as they exist today.

Recommended Action by the CRG: To be determined by CRG.

Justification: The current work activity description, management issues, standards, and implementation considerations do not reflect the conditions and requirements as they exist today and should therefore be revised.

Cost Impact: None. The changes proposed are administrative in nature and only affect the NV WSS documentation.

Schedule Impact: None. The changes proposed are administrative in nature and only affect the NV WSS documentation.

Impact on the Work if Change Is Not Made: The WSS documentation will not reflect current conditions or appropriate standards.

Attachments: Redline copy of format-1 for WBS 1.5.5-Scientific and Technical Information.

WBS: 1.5.5 **Standard Number:** Executive Order 12958

WBS: 1.5.5 **Standard Number:** 5 USC 552

WBS: 1.5.5 **Standard Number:** 10 CFR 781

WBS: 1.5.5 **Standard Number:** 10 CFR 768

Baseline Change Request Log

WBS: 1 5 5	Standard Number: 32 CFR 2001
WBS: 1.5.5	Standard Number: 48 CFR 927
WBS: 1 5 5	Standard Number: DOE G 241.1-1
WBS: 1.5.5	Standard Number: 5 USC 552a
WBS: 1.5.5	Standard Number: 48 CFR 952.227
WBS: 1.5.5	Standard Number: 42 USC 2201, et seq.
WBS: 1.5.5	Standard Number: 42 USC 2161
WBS: 1.5.5	Standard Number: 42 USC 13201
WBS: 1.5.5	Standard Number: 17 USC 702
WBS: 1 5 5	Standard Number: OMB Circular A-130
WBS: 1.5.5	Standard Number: DOE O 241.1A
WBS: 1 5 5	Standard Number: DOE O 1430.1D, CRD
WBS: 1.5.5	Standard Number: DOE O 5650.2B
WBS: 1.5.5	Standard Number: 63 USC 15, Sections 3701-3715
WBS: 1.5.5	Standard Number: 10 CFR 782
WBS: 1.5.5	Standard Number: 10 CFR 605

Baseline Change Request Log

WBS: 1 5 5 **Standard Number:** DOE G 1430.1D-1

Baseline Change Request Log

BCR: 2001-020 **Correction of format-1 to reflect current conditions and mandatory standards. 4.1.1 - Fire Protection: Emergency Response;**

Approval Date: 11/9/2001

Disapproved:

Description: Corrections are needed to the 4.1.1 - Fire Protection: Emergency Response format-1 to accurately reflect the work activity, issues, considerations as they exist today, to correct errors in regulatory citations, and to add, for the purpose of completeness, a number of mandatory laws, regulations, and standards that were previously not included or became effective since the last format-1 revision.

Recommended Action by the CRG: Approve changes as proposed.

Justification: Current work activity descriptions do not reflect the work activity as it exist today and should therefore be revised to reflect existing conditions. Additionally, the current set of WSS contain errors in regulatory citations that should be corrected for accuracy. There were also a number of mandatory laws, regulations, and standards that were not previously included that should be added so that the set of WSS for the two affected work activities are complete and accurate.

Cost Impact: None. The changes proposed are administrative in nature and only affect the NV WSS documentation. The corrected and added mandatory laws regulations, and standards are already being implemented as required.

Schedule Impact: None. The corrected and added mandatory laws, regulations, and standards are already being implemented as required.

Impact on the Work if Change Is Not Made: Some aspects of the affected work activity will not be addressed by WSS or B List standards in that the current work activity descriptions do not address all aspects of the affected work as it exists today. The WSS activity description, which serve as the basis for hazard identification and standards selection, will be inaccurate resulting in an incomplete set of standards being identified to address all the actual work.

Attachments: Redline and corrected copies of format-1 for WBS 4.1.1-Fire Protection: Emergency Response.

WBS: Standard Number:

Baseline Change Request Log

BCR: 2001-019 **Correction of standards and work activity description: 3.6 - Transportation,**

Approval Date: 9/19/2001

BCR not checked for Approved/Disapproved and not signed.

Disapproved:

Description: Corrections are needed to the Transportation format-1 to accurately reflect the work activity, issues and considerations as they exist today, to correct errors in regulatory citations, and to add, for the purpose of completeness, a number of mandatory laws, regulations, and standards that were previously not included.

Recommended Action by the CRG: In accordance with NV M 450.3XA, NV WSS Manual, Chapter II, para. 5, the CRG is requested to charter an SME/IR review and evaluation of the changes proposed in the attached redline format-1 as well as the changes proposed under BCR-2001-014 presented to the CRG on 07/25/01. Reviewers will prepare a final BCR and revised format-1 reflecting consensus changes.

Justification: The current work activity description does not reflect the work activity as it exist today at the M&O operations and should therefore be revised to reflect existing conditions. Additionally, the current set of WSS contain errors in regulatory citations that should be corrected for accuracy. There were also a number of mandatory laws, regulations, and standards that were not previously included that should be added so that the set of WSS are complete and accurate.

Cost Impact: TBD after SME/IR review.

Schedule Impact: TBD after SME/IR review.

Impact on the Work if Change Is Not Made: Some aspects of the affected work activity will not be addressed by WSS or B List standards in that the current work activity description does not address all aspects of the affected work as it exists today at the M&O operations. The WSS activity description, which serves as the basis for hazard identification and standards selection, will not be accurate resulting in an incomplete set of standards being identified to address all the work.

Attachments: Redline copy of format-1 for WBS 3.6 - Transportation.

WBS: **Standard Number:**

Baseline Change Request Log

BCR: 2001-018 **Correction of standards and work activity description: 3.5.1 - Heavy Equipment Maintenance**

Approval Date: 10/4/2001

Disapproved:

Description: Corrections are needed to the format-1 for 3.5.1 - Heave Equipment Maintenance to clarify/correct the work activity, management issues, and implementation considerations to reflect existing conditions and to add standards applicable to the work activity.

Recommended Action by the CRG: Approve changes as proposed.

Justification: Current work activity descriptions do not reflect the work activity, management issues, and implementation considerations as they exist today and should therefore be revised to reflect existing conditions. Additionally, the current set of WSS does not include all the standards required for the work activity.

Cost Impact: None. The changes proposed are administrative in nature and only affect the NV WSS documentation.

Schedule Impact: None. The work activity and standards are currently being implemented as required.

Impact on the Work if Change Is Not Made: The format-1 for 3.5.1 - Heavy Equipment Maintenance will not be reflect the work activity, issues and consideration as they exists today. The set of standards identified for the work activity will not be adequate to address the current hazards, technical or management issues.

Attachments: Redline and clean copy of format-1s for WBS 3.5.1 - Heavy Equipment Maintenance.

WBS: **Standard Number:**

Baseline Change Request Log

BCR: 2001-017 Secondary standards references, 2.7.1, Design Engineering

Approval Date: 10/4/2001

Disapproved:

Description: During the DOE ISM Phase I Verification issues were raised regarding the use of Class 2 standards. A commitment was made to disposition the appropriate Class 2 Standards through the CRG to obtain DOE approval as appropriate. The proposed changes to the format-1 for 2.7.1, Design Engineering address one Class 2 Standard previously approved by Bechtel Nevada, i.e., the Sheet Metal and Air-Conditioning Contractors' National Association, HVAC Systems (SMACNA, HVAC Systems). In addition to addressing this specific Class 2 Standard, changes are proposed to clarify the intended use and breadth of the list of secondary standards that may be brought into play as a result of implementing the primary standards listed in Section 3, Standards.

Recommended Action by the CRG: Approved the proposed changes.

Justification: This change is necessary to address an ISM Phase I Verification commitment to disposition approved Class 2 Standards through the CRG.

Cost Impact: None. The change is to clarify existing WSS documentation. No new or changed requirements are invoked.

Schedule Impact: None. The change is to clarify existing WSS documentation. No new or changed requirements are invoked.

Impact on the Work if Change Is Not Made: A commitment made to address an ISM Phase I Verification finding will not be met.

Attachments: Redline copy of format-1 for WBS 2.7.1-Design Engineering.

WBS: Standard Number:

Baseline Change Request Log

BCR: 2001-016 Updating Nuclear Explosives Directives, DOE O 452.1B and O 452.2B

Approval Date: 11/28/2001

Disapproved:

Description: This change proposed the replacement of two DOE Directives with the current DOE Directives on List B2 and B3 as identified below:

DOE O 452.1 B, Nuclear Explosives and Weapons Surety Program, dated 8/6/2001

DOE O 452.2B, Safety of Nuclear Explosive Operations, dated 8/7/2001.

These Directive replace DOE O 452.1A and DOE O 452.2A as currently listed on List B2 and B3. This change affects BN and WSI NV contracts and agreements with DOE/AL and DOE/OAK regarding requirements applicable to LLNL, LANL, and SNL when conducting work under the purview of NNSA/NV.

Recommended Action by the CRG: By accepting this BCR, the two B revisions to the directives identified above will be inserted in place of the existing A revisions, thereby updating List B2 and B3 as applicable to contracts and agreements.

Justification: This action is to ensure contracts and agreements mandate application of current DOE Directives regarding nuclear explosives.

Cost Impact: Cost impacts are not anticipated to be significant regarding this BCR.

Schedule Impact: Schedule impacts are not anticipated to be significant regarding this BCR.

Impact on the Work if Change Is Not Made: Without making this change, the most current DOE requirements would not be mandated in contracts and agreements.

Attachments: DOE O 452.1B and DOE O 452.2B are available on the web at Explorer.

WBS: B2 Standard Number: DOE O 452.2B

WBS: B2 Standard Number: DOE O 452.1B

WBS: B2 Standard Number: DOE O 452.1A

Baseline Change Request Log

WBS: R2 **Standard Number:** DOE O 452.2A

WBS: R3 **Standard Number:** DOE O 452.2A

WBS: R3 **Standard Number:** DOE O 452.2B

WBS: R3 **Standard Number:** DOE O 452.1A

WBS: R3 **Standard Number:** DOE O 452.1B

BCR: 2001-016 Update format-1 for 1.1.5 - Training to reflect current work activity and conditions

Approval Date: 10/4/2001

Description: Corrections are needed to the format-1 for 1.1.5 - Training to accurately reflect the work activities, issues, and considerations as they exist today.

Disapproved:

Recommended Action by the CRG: Approve changes to format-1 as proposed.

Justification: The current work activity description, management issues, and implementation considerations do not reflect the conditions as they exist today and should therefore be revised.

Cost Impact: Non. The changes proposed are administrative in nature and only affect the NV WSs documentation.

Schedule Impact: None.

Impact on the Work if Change Is Not Made: The WSS documentation will not reflect current conditions.

Attachments: Redline and clean copies of the format-1 for WBS 1.1.5-Training.

WBS: **Standard Number:**

Baseline Change Request Log

BCR: 2001-015 WBS 4.7, Quality Assurance and List B2/B3

Approval Date: 9/5/2001

Disapproved:

Description: This BCR proposes to update the reference to the current DOE Directive on QA in NV-WSS, WBS 4.7 and List B2 and B3. DOE Directive O 414.1A, Quality Assurance, CRD, has been changed by Change No. 1, dated 7/12/2001. The directive on Quality Assurance applies to a contractors other work conducted under the purview of NNSA/NV (work not covered by the scope of the QA Rule and Price Anderson Amendments Act where the QA rule is required by regulation).

It should also be noted that the fundamental criteria for QA in this directive are as adopted in the existing NV WSS and in the QA Rule. Each has some general requirements and are similar, i.e. grade approach, etc. Change 1 had no effect on any of the QA requirements section of the Directive or the CRD. The Change provided clear policy that the objective and applicability of the Directive included NNSA federal employees and work conducted under the purview of the NNSA and assigned Operations Offices, such as NNSA/NV.

Recommended Action by the CRG: By acceptance of this proposed baseline change request:

A. The WBS 4.7, Quality Assurance, Format 1, Section 3, Standards, be changed to clarify the reference to the current DOE Directive O 414.1A, CHG 1, CRD, dated 7/12/2001 for non PAAA work activities. The note following the listing of the Directive should be revised to cite "DOE directive provides...", rather than "DOE O 414.1A, CRD provides...".

B. The Lists B2 & B3 will be changed to reference DOE Order 414.1A, CHG 1, CRD, Quality Assurance.

Justification: This change updates the NV WSS to cite the current DOE QA Order for proper reference to applicable QA standards in DOE/NV WSS WBS 4.7, Quality Assurance and lists B2 and B3.

Cost Impact: The standards have not significantly changed therefore the cost impact of this BCR is none.

Schedule Impact: The standards have not significantly changed therefore the schedule impact of this BCR is none.

Impact on the Work if Change Is Not Made: Agreement parties to contracts and agreements would not documented consensus on the current and applicable DOE Directive on QA.

Baseline Change Request Log

Attachments: The DOE Directive O 414.1A Change 1 is available from the NV DMC Home Page.

WBS: 4 7 **Standard Number:** DOE O 414.1A Chg 1, CRD

WBS: B2 **Standard Number:** DOE O 414.1A Chg 1, CRD

WBS: B3 **Standard Number:** DOE O 414.1A Chg 1, CRD

Baseline Change Request Log

BCR: 2001-014 NV Work Smart Standard (WSS) 3.6 Transportation

Approval Date: 11/10/2001

Disapproved:

Description: Add Contractor Requirement Documents (CRD) of DOE Orders 460.1A, 460.2, 461.1, and NNSA/NV Policy P 460.X to the WSS. Add performance measurement parameters in Section 4 of WSS. Remove reference to NV-356 "Hazardous Material On-site Transportation Safety Manual, NTS" from Section 5 of WSS.. Add and delete various items in Format 1 to reflect current activities and conditions, and for clarity and accuracy.

Recommended Action by the CRG: By acceptance of this proposed change request:

A. Applicable contractors will be required to conform to the above CRD when transporting, transferring, or packaging DOE materials and property.

Justification: The incorporation of CRD's of DOE Orders 460.1A, 461.1 establishes safe, consistent packaging, transfer and transportation of DP and EM materials as required by 10 CFR 830 for on-site and applicable off-site operations for which NNSA/NV has purview. DOE Order 460.2 establishes the policies and requirements to supplement applicable laws, rules, regulations, and other DOE orders for departmental materials transportation and packaging management. Incorporation of P 460.X ensures use of the Hazardous Materials Notification System (HAZTRAK) for on-site transfers of hazardous materials.

DOE Orders 460.1A and 460.2 are only currently incorporated into the BN contract through a contract clause. DOE Order 461.1 establishes on-site packaging, transfer, and transportation requirements and cancels DOE Order 5610.12 which is currently identified in the B2/B3 list.

Removal of performance measurement parameters to reflect current work activity. Deletion of implementation citation is made due to the discontinuance of this NNSA/NV directive.

Cost Impact: Cost impacts are not known at this time.

Schedule Impact: Schedule improvement or slippage as a result of the requested change are not known at this time.

Impact on the Work if Change Is Not Made: Inconsistent implementation of transportation, transfer, and packaging requirements.

Baseline Change Request Log

Attachments: WSS 3.6 “Transportation” (with edits)

CRD of DOE Order 460.1A “Packaging and Transportation Safety”

CRD of DOE Order 460.2 “Departmental Materials Transportation and Packaging Management”

CRD of DOE Order 461.1 “Packaging and Transfer or Transportation of Materials of National Security Interest”

NNSA/NV Policy P 460.X Implementation and Operation of the Hazardous Materials Notification System (HAZTRAK).

WBS: 3.6.h **Standard Number:** DOE O 460.1A, CRD

WBS: 3.6.h **Standard Number:** DOE O 461.1, CRD

WBS: 3.6.h **Standard Number:** NV P 460.X

WBS: 3.6.h **Standard Number:** DOE O 460.2, CRD

Baseline Change Request Log

BCR: 2001-013 WBS 4.7, Quality Assurance and List B2/B3

Approval Date: 5/16/2001

Disapproved:

Description: This BCR proposes to update the reference to the current QA regulation and DOE Directive in NV-WSS. 10 CFR 830.120, Subpart A, effective April 10, 2001, (the QA Rule) replaced earlier published versions of QA requirements governing safety at DOE nuclear facilities. DOE Directive O 414.1A, Quality Assurance, CRD, replaced the DOE Directive 5700.66, Quality Assurance, for other work (work not covered by the scope of the QA Rule) conducted under the purview of DOE/NV.

It should be noted that the DOE Directive on QA provides latitude to respond to the special needs of any work activity and any nationally recognized quality standard, such as NQA-1, ISO 9000, Military Standards 98-58, etc. should they be adopted by any organization doing business on DOE/NV management sites.

It should also be noted that the fundamental requirements or criteria for QA in these documents adopted as NV WSS have not significantly changed; however, the definition of Non reactor nuclear facility has changed in the Rule. Non reactor nuclear facility means those facilities, activities, or operations that involve, or will involve, radioactive and /or fissionable materials in such form and quantity that a nuclear or a nuclear explosive hazard potentially exists to workers, the public, or the environment, but does not include accelerators and their operations and does not include activities involving only incidental use and generation of radioactive material or radiation such as check and calibration sources, uses of radioactive sources in research and experimental and analytical laboratories activities., electron microscopes, and X-ray machines.

Recommended Action by the CRG: By acceptance of this proposed baseline change request:

A. The WBS 4.7, Quality Assurance, Format I, Section 3, Standards, be changed to clarify the reference to the current Rule as 10 CFR 830.120, Subpart A, effective April 10, 2001, for nuclear facilities activities; and add DOE Directive O 414.1A, CRD, and delete DOE Order 5700.66, for other activities. The note following the listing of the Rule should be changed to "Applicable requirements for safety at nuclear facilities". The note following the listing of the Directive should be revised to cite "DOE O 414.1A, CRD", rather than "DOE 5700.6C".

B. The Lists B2 & B3 will be changed to add DOE Order 414.1A, CRD, Quality Assurance, and List B3 will be changed by deleting DOE G 414.1-2 Quality Assurance Management System Guide for use with 10 CFR 830.720 and DOE Order 474.7.

Baseline Change Request Log

Note: The laboratories will be expected to comply with the Rule 10 CFR 830.120 as a matter of existing contract (the regulation is included in Appendix G of the LLNL and LANL contracts) where applicable in Nevada.

Justification: This change updates the current and proper reference to applicable QA standards which were already included in DOE/NV WSS WBS 4.7, Qualify Assurance. In addition the B2 and B3 lists either failed to identify the applicable DOE DOE Order (List B2) or cited a DOE Guide rather than the applicable DOE Directive (List B3). Current DOE Manual requirements on the Directive System DOE M 251 .I-I A, directives contain requirements for contractors are contained in CRDs attached to directives, and DOE guides only provide methods which if followed will meet DOE expectations). Guides are not requirements documents and are not normally included in NV WSS.

The QA requirements are essentially the same in both the Rule and the Directive, however, applicability of the Rule brings into focus enforcement by DOE/HQ EH-2 and the Price Anderson Amendment Act penalties. The scope of work activities has clearly been expanded to include activities involving nuclear explosive potential.

Cost Impact. The standards have not significantly changed therefore the cost impact of this BCR is none.

Schedule Impact: The standards have not significantly changed therefore the schedule impact of this BCR is none.

Impact on the Work if Change Is Not Made: Agreement parties to contracts and agreements would not documented consensus on the current and applicable QA Rule and DOE Directive on QA.

Attachments: The Rule is available from the Federal Register Vol 66, No 7, Wednesday, January 10, 2001. The DOE Directive O 414.1A is available from the NV DMC Home Page.

WBS: 4.7 **Standard Number:** DOE O 5700.6C

WBS: 4.7 **Standard Number:** 10 CFR 830.120, Subpart A

WBS: 4.7 **Standard Number:** DOE O 414.1A, CRD

Baseline Change Request Log

WBS: R2	Standard Number: DOE O 414.1A, CRD
WBS: R2	Standard Number: 10 CFR 830.120, Subpart A
WBS: R3	Standard Number: DOE O 414.1A, CRD
WBS: R3	Standard Number: 10 CFR 830.120, Subpart A
WBS: R3	Standard Number: DOE G 414.1-2

Baseline Change Request Log

BCR: 2001-012 WBS 1.8, Administrative Systems and Controls, and List B2/B3, Add DOE M 140.1-1B, Interface with the Defense Nuclear Facility Safety Board

Approval Date: 8/13/2001

Disapproved:

Description: This change replaces DOE M 140.1-1A with the current revision DOE M 140.1-1B, CRD, Interface with the Defense Nuclear Facility Safety Board, dated March 30, 2001, for WBS 1.8, Administrative Systems and Controls.

This change does not propose that DOE M 140.1-1B be added to the Lists B2 and B3 because both LLNL and LANL contracts have, at the very least, the A revision to the DOE Directive included in their Directives list (Appendix G). The 6 revision did not include any significant new requirements.

DOE/OAK and DOE/AL have primary responsibility to incorporate such Directives into the laboratory contracts. And, NNSA/NV actions to mandate use of such Directives by laboratories in Nevada using the B2 and B3 lists has been held in abeyance by the CRG, pending completion of the work of the DOE/NV Tri-Laboratory Convened Group.

Recommended Action by the CRG. By acceptance of this proposed change request:

A. BN and WSI will be required to conform to the requirements of the CRD regarding interface with the DNFSB.

B. The Format 1 for WBS 1.8 Administrative Systems and controls will be changed as follows:

- Section 3, Standards: change DOE M 140.1A to DOE M 140.1B Interface with Nuclear Facility Safety Board.

Justification. This DOE manual is already designated as a NV-WSS. This change is to cite the current B revision to the Directive. There were not significant changes made to the CRD, in comparison of the B revision to the A revision. A preamble and a requirement, l(b)(3), regarding conducting activities consistent with department commitments, was added to the CRD. All other requirements remained the same.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work of Change Is Not Made. The most current requirements DOE/NV Management expects to be

Baseline Change Request Log

implemented will not be in NV-WSS and by reference in applicable contracts. Headquarters could not be assured by the Manager that, DOE/NV contractors conducting work on DOE/NV controlled property will comply with headquarters mandated interface mechanism to ensure effective relationships and communications are controlled between DOE and contractors and the staff of the DNFSB.

Attachments. DOE M 140.1-1B, CRD, Interface with the Defense Nuclear Facility Safety Board, dated 03-30-01, is an approved DOE Directive maintained on the DMC Home page under Headquarters Directives.

Note dated 4/9/2001: BCR 2000-013 initially proposed adding DOE M 140.1A, CRD, to WBS 1.8 and List B2 and B3. Due to a general issue raised by R. Higgs that BCR 2000-013 was approved 11/15/2000 with the exception that reference to List B2 and B3 be deleted from that BCR. This note provides for the possible future consideration of a new BCR change which may be determined necessary in the future to address how DOE/NV mandates applicability of DOE M 140.1A, CRD, to national laboratories for NTS. The general issue of non ES&H requirements documents raised by R. Higgs, 11/15/2000 is pending resolution by the CRG Chairman. An action item for the CRG had been established to track the possibility for an additional BCR to be required to address applicability of the M 140.1A to national laboratories at NTS. After checking laboratory contracts and finding the DOE M 140.1-1A directive being included in the contract Appendix G, it appears consistent for the Directive to be ;applicable to laboratories in Nevada. It is assumed the lab contracts will also be updated to adopt the B revision to the Directive. This BCR fulfills the action assigned to the CRG with respect to DOE M 140.1-1 for the interim until the DOE/NV Tri-Laboratory Convened Group completes its work. The issue of including more than ES&H and remains pending further action by the CRG. M. Kunich.

Note dated 8/8/2001: BCR 2001-012 initially proposed adding DOE M 140.1B, CRD to WBS 1.8 of NNSA/NV WSS and List B2 and B3, because the DOE Directive was revised to a "B" revision. The Tri-Laboratory Convened Group has still not completed its work, and DOE/NV must fulfill its contracting Officer responsibilities to assure applicable DOE Directives are maintained up to date in its contracts. Therefore, this action was changed as revision "a", BCR 2001-012a, affects BN and WSI only. This action by the CRG Chairman on BCR 2001-012a reflects a change to draft BCR 2001-012 so it applies to the BN and WSI contracts only, and deletes reference to the B2 and B3 lists, consistent with discussions in the CRG meeting dated May 16, 2001, minutes. It is also noted as verified on 8/8/2001, the DOE O 140.1B revision is in the LLNL contract, Appendix G, effective May 14, 2001, and the DOE O 1409.1A revision is; in the LANL contract, effective August 25, 2000, as provided on the NNSA/NV ISMS Home Page. Therefore, this BCR 2001-012a affects BN and WSI only, and has been approved by the Chairman, CRG, as dated above. The Convened Group resolutions regarding WSS for

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laboratories remain pending. M. Kunich.

WBS: 1 8 **Standard Number:** DOE M 140.1-1B, CRD

WBS: B2 **Standard Number:** DOE M 140.1-1B, CRD

WBS: B3 **Standard Number:** DOE M 140.1-1B, CRD

Baseline Change Request Log

BCR: 2001-012 WBS 1.8, Administrative Systems and Controls, and List B2/B3, Add DOE M 140.1-1B, Interface with the Defense Nuclear Facility Safety Board

Approval Date:

Not approved - replaced by BCR 2001-012a.

Disapproved:

Description: This change replaces DOE M 140.1-1A with the current revision DOE M 140.1-1B, CRD, Interface with the Defense Nuclear Facility Safety Board, dated March 30, 2001, for WBS 1.8, Administrative Systems and Controls. This change also proposes that DOE M 140.1-1B be added to the Lists B2 and B3 because both LLNL and LANL contracts have the A revision to the DOE Directive included in their Directives list (Appendix G).

Recommended Action by the CRG. By acceptance of this proposed change request:

A. BN and WSI and the National Laboratories will be required to conform to the requirements of the CRD regarding interface with the DNFSB.

B. The Format 1 for WBS 1.8 Administrative Systems and controls will be changed as follows:

- Section 3, Standards: change DOE M 140.1A to DOE M 140.1B Interface with Nuclear Facility Safety Board.

Justification. This DOE manual is already designated as a NV-WSS. This change is to cite the current B revision to the Directive. There were not significant changes made to the CRD, in comparison of the B revision to the A revision. A preamble and a requirement, l(b)(3), regarding conducting activities consistent with department commitments, was added to the CRD. All other requirements remained the same.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work of Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in NV-WSS and by reference in applicable contracts. Headquarters could not be assured by the Manager that, DOE/NV contractors conducting work on DOE/NV controlled property will comply with headquarters mandated interface mechanism to ensure effective relationships and communications are controlled between DOE and contractors and the staff of the DNFSB.

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Attachments. DOE M 140.1-1B, CRD, Interface with the Defense Nuclear Facility Safety Board, dated 03-30-01, is an approved DOE Directive maintained on the DMC Home page under Headquarters Directives.

Note: BCR 2000-013 initially proposed adding DOE Y 140.1A, CRD, to WBS 1.8 and List B2 and B3. Due to a general issue raised by R. Higgs that BCR 2000-013 was approved 11/15/2000 with the exception that reference to List B2 and B3 be deleted from that BCR. This note provides for the possible future consideration of a new BCR change which may be determined necessary in the future to add- how DOE/NV mandates applicability of DOE M 140.1A, CRD, to national laboratories for NTS. The general issue of non ES&H requirements documents raised by R. Higgs, 11/15/2000 is pending resolution by the CRG Chairman. An action item for the CRG had been established to track the possibility for an additional BCR to be required to address applicability of the M 140.1A to national laboratories at NTS. After checking laboratory contracts and finding the DOE M 140.1-1A directive being included in the contract Appendix G, it appears consistent for the Directive to be applicable to laboratories in Nevada. It is assumed the lab contracts will also be updated to adopt the B revision to the Directive. This BCR fulfills the action assigned to the CRG with respect to DOE M 140.1-4 for the interim until the DOE/NV Tri-Laboratory Convened Group completes its work. The issue of including more than ES&H remains pending further action by the CRG. MKunich.

WBS: 1.8 **Standard Number:** DOE M 140.1-1B, CRD

WBS: B2 **Standard Number:** DOE M 140.1-1B, CRD

WBS: B3 **Standard Number:** DOE M 140.1-1B, CRD

Baseline Change Request Log

BCR: 2001-011 Delete WBS 2.11, Radioactive Waste Acceptance Program, Format 1

Approval Date: 5/16/2001

Disapproved:

Description: This BCR proposes the deletion of WBS 2.1 1, Radioactive Waste Acceptance Program (RWAP) from the DOE/NV Work Smart Standards (NV-WSS), as recommended by the Waste Management Standards Identification Team..

Recommended Action by the CRG: Delete WBS 2.1 1, RWAP, from NV-WSS.

Justification: The work described in the NV-WSS is limited to work assigned by contract or other agreement to contractors, national laboratories, and other users of sites, facilities, and activities under the control of DOE/NV. The requirements on the work of the! RWAP are not assignable, are retained by DOE/NV, and must be met by DOE/NV management and federal staff. As the standard set of requirements applicable to the RWAP are not applicable to contractors, labs, etc., they should be deleted from the NV-WSS.

Any miscellaneous RWAP technical support provided by contractors to DOE/NV is inherently DOE work and, therefore, must meet the requirements levied on DOE/NV as the organization that authorizes and approves off-site DOE and contractor organizations to dispose of their waste at the NTS radioactive waste disposal facility.

The NV-WSS requirements applicable to the operational activities of the NTS radioactive waste management facilities and to the off-site LLW generators are defined in NV-WSS under WBS element 2.1.7 Radioactive Waste Management.

Cost Impact: There is no cost impact associated with this proposed change.

Schedule Impact: There is no schedule impact associated with this proposed change.

Impact on the Work if Change Is Not Made: NV-WSS would continue to erroneously contain requirements on DOE federal staff. Such requirements are more appropriately contained in DOE/NV directives (not CRD attachments).

Attachments: None, the NV-WSS Format 1 is available on the DOE/NV Home Page. See WBS element 2.11, RWAP.

Baseline Change Request Log

WBS:

Standard Number:

Baseline Change Request Log

BCR: 2001-010 DOE O 350.1, CHG 1, CRD, Added Directive to Five WBS Elements

Approval Date:

Disapproved:

Withdrawn.

Description: This change request is to propose DOE O 350.1, CHG 1, CRD, be added to the following WBS Elements of WSS all of which relate to human resource and labor relations:

- 1.1.1 Employment*
- 1.1.2 Employee Relations*
- 1.1.3 Compensation*
- 1.1.4 Health and Welfare/Pension Plans*
- 1.1.7 Labor Relations*

It should be noted that this DOE Directive has a Contractor Requirements Document (CRD), Attachment 1 for each of nine Chapters. Each CRD clearly identifies the human resources function for which specific requirements are identified for contractor implementation. It appears unique for a DOE Directive to have more than one CRD to address human resource and labor relations requirements in one Directive.

Recommended Action by the CRG:

It is recommended that the CRG:

- 1. Adopt DOE O 350.1, CHG 1, CRD, Contractor Human Resource Management Programs, as a part of each of the five WBS elements above for implementation by DOE/NV major contractors (BN & WSI)*
- 2. Modify each of the five Format 1s as follows: Section 3 -add DOE O 350.1, CHG 1, CRD*
- 3. Modify only WBS 1.1.1 Employment as follows: Section 1 - add at the end of Work Activity: " Risk Management and Liability Programs. This activity includes requirements related to commercial or self insurance programs and reporting data during contract performance, and coordination and SUCCeSSion during DOE contract transition actions".*

Justification: Most of the requirements associated with employment of individuals and labor are addressed in laws and regulations. At the time NV WSS were initially developed, this DOE Directive was in Draft. The requirements of the Directive provide additional coordination and reporting requirements which facilitate the accomplishment of federal requirements and responsibilities. These requirements have been implemented by NV contractors during the interim. This action is to get requirements in line with implementation.

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Cost Impact: None

Schedule Impact: None

Impact on the Work if Change Is Not Made: Information will continue to be requested by DOE/NV and contractors may continue to provide it. DOE/NV may not be able to meet its commitments to DOE/HQ and Department of Labor, if the contractor questions some of these requests.

Attachments: DOE O 350.1, CHG 1, Contractor Human Resource Management Programs. This directive is available from Explorer on the Internet.

WBS: 1.1.1	Standard Number: DOE O 350.1, Chg 1, CRD
WBS: 1.1.2	Standard Number: DOE O 350.1, Chg 1, CRD
WBS: 1.1.3	Standard Number: DOE O 350.1, Chg 1, CRD
WBS: 1.1.4	Standard Number: DOE O 350.1, Chg 1, CRD
WBS: 1.1.7	Standard Number: DOE O 350.1, Chg 1, CRD

Baseline Change Request Log

BCR: 2001-009 Page Changes to DOE/NV WSS Manual Directive (Change has no affect on CRD)

Approval Date: 4/3/2001

Disapproved:

Description: THIS CHANGE HAS NO AFFECT ON THE CONTRACTOR REQUIREMENTS DOCUMENT OF THE MANUAL AND IS PROCESSED THROUGH THE CRG TO MAINTAIN CURRENT DIRECTIVE NUMBERS.

This change involves clarification of the CRG Charter regarding Quorum definition and changes to the resume form, NV federal responsibilities for retention of records, and information to comply with the Privacy Act as defined in DOE/NV M 450.3XA, CHG 1, CRD, draft.

Recommended Action by the CRG. CRG approval of this change will replace the previously approved Directive (DOE/NV M 450.3.X,CRD) with DOE/NV M 450.3.X, CHG 1, CRD, DOE/NV Work Smart Standards Manual, Contractor Requirements Document as the adopted NV-WSS. This change will also be made on List B82 and B3 to reflect the applicability of the most current NV Directive on the National Laboratories.

Justification. The changes that have been incorporated in this Directive only involve the definition of quorum for the CRG on the Charter, Attachment 2, and other information regarding the Privacy Act. This changes are relatively minor in nature, and have been processed through the CRG for WSS configuration control purposes. The Changes regarding Privacy Act were developed with the assistance of the NV Privacy Act coordinator, Roxanne Dey. The revised definition of CRG quorum is per the 11/15/2000 draft CRG Meeting minutes.

Cost Impact Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. Configuration control of the most current Directives in WSS and B lists would be lost. The most current requirements DOE/NV Management expects to be implemented will not be in WSS and by reference in applicable contracts and agreements with Contractors and National Laboratories.

Attachments. DOE/NV M 450.3X, CHG 1, CRD, DOE/NV WSS Manual, draft dated my mpk 3/2/2001.

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WBS: 1 8 **Standard Number:** NV M 450.3XA Chg 1, CRD

WBS: B2 **Standard Number:** NV M 450.3XA Chg 1, CRD

WBS: B3 **Standard Number:** NV M 450.3XA Chg 1, CRD

Baseline Change Request Log

BCR: 2001-008 NV M 220.XA CHG 2, Oversight Management System

Approval Date: 2/26/2001

Disapproved:

Description: This change adds DOE/NV M 220.XA CHG 2, CRD, Oversight Management System, to WBS 1.8 Administrative Systems and Controls and List B2 and List B3, and replace DOE/NV M 220.XA, CRD of 8-22-00.

The results of Change 2 are:

- Changes which affect actions of DOE/NV federal personnel, and
- Addition of an Emergency Management function which will require DOE/NV BMOP oversight and PBMC oversight.

There were no changes to the CRD resulting from Change 2.

Recommended Action by the CRG: By acceptance of this proposed change request:

A. BN and WSI will be required to conform to the requirements of the CRD attached to the above listed DOE/NV directive by contract regarding the subject matter.

B. The national laboratories will be required to conform to the requirements of the CRD attached to the above listed DOE/NV directive by change to the List B2 and B3 being provided to DOE/AL and DOE/OAK, and DOE/NV requesting it be added to the LLNL, LANL, and SNL contracts.

C. The Format 1 for WBS 1.8, Administrative Systems and Controls will be changed as follows:

- Section 3, Standards. The Directive number for Work Control will be updated to reflect NV M 220.XA CHG 2, CRD.

D. The Lists B2 and B3 The Directive number for Work Control will be updated to reflect NV M 220.XA CHG 2, CRD.

Justification: This change reflects improvements to an NV Directive which was previously justified as a DOE/NV WSS. This directive is considered safety related and will affect organizations integrated safety management systems.

Cost Impact. The cost impact of this change is not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Baseline Change Request Log

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in NV-WSS and binding by reference in applicable contracts and agreements.

Attachments. The DOE/NV draft directive NV M 220.XA CHG 2, CRD is all available on the DOE/NV Home Page under the DMC, DOE/NV Directives, (click on Drafts).

WBS: 1.8	Standard Number: NV M 220.XA, CRD
WBS: 1.8	Standard Number: NV M 220.XA, Chg 2, CRD
WBS: B2	Standard Number: NV M 220.XA, Chg 2, CRD
WBS: B3	Standard Number: NV M 220.XA, Chg 2, CRD

Baseline Change Request Log

BCR: 2001-007 NV O 412.X3A (revision), "Work Control"

Approval Date: 2/26/2001

Disapproved:

Description: This change adds DOE/NV O 412.X3A, CRD, Work Control to WBS 1.8 Administrative Systems and Controls and List B2 and List B3, and replaces the canceled DOE/NV O 412.X3, CRD of 8-22-00.

Changes have been made to this directive by DOE/NV to incorporate corrective action plans resulting from the Phase 2 ISMS verification review.

Recommended Action by the CRG: By acceptance of this proposed change request:

- A. BN and WSI will be required to conform to the requirements of the CRD attached to the above listed DOE/NV directive by contract regarding the subject matter.*
- B. The national laboratories will be required to conform to the requirements of the CRD attached to the above listed DOE/NV directive by change to the List B2 and B3 being provided to DOE/AL and DOE/OAK, and DOE/NV requesting it be added to the LLNL, IANL, and SNL contracts.*
- C. The Format 1 for WBS 1.8, Administrative Systems and Controls will be changed as follows:*
 - Section 3, Standards. The Directive number for Work Control will be updated to reflect NV O 412.X3A, CRD.*
- D. The Lists B2 and B3 The Directive number for Work Control will be updated to reflect NV O 412.X3A, CRD.*

Justification: This change reflects improvements to an NV Directive which was previously justified as a DOE/NV WSS. This directive is considered safety related and will affect organizations integrated safety management systems.

Cost Impact. The cost impact of this change is not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in NV-WSS and binding by reference in applicable contracts and agreements.

Attachments. The DOE/NV draft directive NV O 412.X3A, CRD is all available on the DOE/NV Home Page

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under the DMC, DOE/NV Directives, (click on Drafts).

WBS: 1.8 **Standard Number:** NV 412.X3, CRD

WBS: 1.8 **Standard Number:** NV 412.X3A, CRD

WBS: B2 **Standard Number:** NV 412.X3A, CRD

WBS: B3 **Standard Number:** NV 412.X3A, CRD

BCR: 2001-006 WBS 1.8 Administrative Systems and Controls, Add NTS Training Access Badge System, WBS 1.8, Administrative Systems and Controls

Approval Date:

Tabled by CRG. 12/19/01 - No hard copy.

Disapproved:

This change request is to propose that the NV M 450.X4, Nevada Test Site Training Access Badge System, Contract Requirements Document, be added WBS 1.8 Administrative Systems and Controls and List B2. This Directive defines the requirements for personnel of all organizations accessing NTS to view the Nevada Test Site Indoctrination Video on an annual basis and possess a valid NTS Training Badge as condition of access.

WBS: **Standard Number:**

Baseline Change Request Log

BCR: 2001-005 WBS 1.3.6, Asset Management, Additional Management Standards for Asset Management,

Approval Date:

Withdrawn - Replaced by 2002-002.

Disapproved:

Description: This change provides for an expanded and clarified scope of ,activities, management issues, and standards as shown on the proposed new Format 1 (see line in / line out version).

The following changes to standards are proposed to be included in the new Format 1, Section 3, Standards, to fulfill the scope of activities as clarified and address the additional management issues identified:

NEW STANDARDS:

- 1) DOE Order 413.3, CRD, Program and Project Management for the Acquisition of Capital Assets, dated October 13, 2000.*
- 2) Construction Program Management Plan (CPMP), Revision 0, as developed by DOE/HQ, dated June 1, 1999.*
- 3) ANSI, EIA - 748, Earned Value Management System.*
- 4) ANSI, EIA - 649, National Consensus Standard for Configuration Management.*
- 5) 10 CFR 830, Subpart A, Quality Assurance Requirements and Subpart B Safety Basis Requirements for activities subject to the rule.*
- 6) DOE Order O 414.1A, CRD, Quality Assurance (for activities using a graded approach, when the QA Rule does not apply).*

CHANGES TO EXISTING DOE/NV LISTED WSS: Deletion of certain portions of DOE O 430.1A, CRD, as defined and canceled by DOE O 413.3.

The DOE Order O 413.3 and the DOE/HQ CPMP define a comprehensive project management process for the cost effective planning, conceptualizing, designing, constructing, and accepting of line item capital construction projects while maintaining the accountability of all involved entities. The current WSS does not contain any specific language on project management process for capital construction projects. It does contain references to the "cradle to grave" responsibilities of the contractor for the acquisition of real property and its related facilities and utilities. This omission needs to be corrected, and this Order and Standard will completely and fully accomplish this.

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Applicability of this Format 1 will be as directed by the Contracting Officer for the DOE/NV contract, or the Manager DOE/NV, for other Agreements, as follows:

- *Performance Based Management Contractor (currently BN)*
- *Security Services Contractor (currently WSI)*

Applicability to LANL, LLNL, and SNL is not currently intended; however, applicability will be reviewed and addressed by the DOE/NV Tri-Lab Convened Group as a part of their Charter in the near future.

Recommended Action by the CRG: By acceptance of this BCR, the proposed new Format 1, attached, will serve as the DOE/NV complex-wide WSS for WBS 1.3.6, Asset Management.

Justification: The original WSS contain references to design, construction, inspection, etc., but not in an overall coordinated process whereby these separate but related functions are tied seamlessly and efficiently together by a comprehensive capital construction project management process. This omission places a needless decision making burden on various DOE and contractor professional personnel working in the various diverse functional areas of the overall project management field. This existing inadequacy is what DOE/HQ has been trying to correct after multiple recent, highly visible, construction/project management problems have surfaced in the national media and congress. It is intended to substantially improve DOE/NV's credibility within the agency itself.

Cost Impact: A comprehensive capital construction project management process will allow DOE/NV to avoid requesting additional funding through better planning, and will allow the contractor to deliver better organized and professional project management services to DOE/NV. The cost to implement the above standards is not expected to be in contention for existing ongoing projects, nor for future projects currently in the budget process.

Schedule Impact: The accountability aspects in the O 413.3 and CPMP will substantially reduce inadvertent schedule slippages regardless of the causative factors. There are no significant schedule issues associated with implementation of this change.

Impact on the Work if Change Is Not Made: Without these standards, there is no assurance that DOE/NV's capital asset management systems would be capable of controlling certain projects in a manner which meets OMB Circulars, NNSA, DOE/HQ, and Secretarial Acquisition Executive expectations, including project management and financial progress (earned value) status reporting.

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Attachments: Attached is a new proposed Format 1, WBS 1.3.6, ASSET MANAGEMENT, red line in, line out version and a corrected version, ANSI, EIA 748 and 649, the Construction Program Management Plan (CPMP), Revision 0, as developed by DOE/HQ, dated June 1, 1999. DOE Directives: O 413.3, O 414.1A, and 10 CFR 830 can be obtained from the DOE Internet.

WBS: 1.3.6	Standard Number: CPMP
WBS: 1.3.6	Standard Number: 10 CFR 830, Subpart A
WBS: 1.3.6	Standard Number: 10 CFR 830, Subpart B
WBS: 1.3.6	Standard Number: DOE O 414.1A, CRD
WBS: 1.3.6	Standard Number: ANSI EIA - 649
WBS: 1.3.6	Standard Number: ANSI EIA - 748
WBS: 1.3.6	Standard Number: DOE O 413.3, CRD
WBS: 1.3.6	Standard Number: DOE O 430.1A, CRD

Baseline Change Request Log

BCR: 2001-004 Additional Pollution Prevention Standards, WBS 4.5, Environmental Protection Program

Approval Date:

DISAPPROVED PENDING RESOLUTION OF OPEN ISSUES.

Disapproved: 5/21/2002

Description: This change is to add additional work activity, hazards/management issues, and standards into the WBS 4.5, Environmental Protection Program. Pollution Prevention was initially included in the Format 1; however, Executive Order 13101, "Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition" along with a number of laws and executive orders provides more focus on that part of the program referred to as pollution prevention.

Recommended Action by the CRG: By accepting this change request the Format 1 for WBS 4.5, Environmental Protection Program, will be revised as follows:

a. Work Activity description. Add the following as the fourth paragraph of Section 1: "Pollution Prevention. National policy has been established which expects federal agencies to establish program requirements to prevent or reduce pollution at its source. Where pollution cannot be prevented, recycling is expected to be pursued in an environmentally safe manner. Further, disposal into the environment should be a last resort and conducted in an environmentally safe manner. The national pollution prevention policy is expected to be achieved through source reduction and other practices to reduce or eliminate pollutant creation through increased efficiency in the use of raw materials, energy, water, or other resources, or through protection of natural resources by conservation.

b. Hazards and Management Issues. Add the following as the last paragraph of Section 2: "Management issues associated with pollution prevention include the establishment and achievement of goals for contractors and their subcontractors which significantly reduce waste and prevent pollution. Without planning for meaningful waste minimization, recycling, and pollution prevention goals and objectives and providing a means to measure and reward/penalize contractor performance; the national pollution prevention policy expectations would not be achieved by the DOE/NV."

c. Standards. The following standards will be added to or deleted from Section 3:

- Delete: Executive Order 12873. Federal Acquisition, Recycling, and Waste Prevention (was replaced by Executive Order 13101).*
- Add:*

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- DOE/NV M 450.X3, CRD, Pollution Prevention Manual
- Resource Conservation and Recovery Act as amended in 1984
- Emergency Planning and Community Right-to-Know Act of 1986
- Pollution Prevention Act of 1990
- Federal Facilities Compliance Act of 1993
- Omnibus Consolidated and Emergency Supplemental Appropriations Act of 1999
- Title 40 CFR Part 247, Comprehensive Guidelines for Procurement of Products Containing Recovered Materials
- Executive Order 13101, Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition
- Executive Order 13148, Greening the Government Through Leadership in Environmental Management
- DOE Order 5400.1, General Environmental Protection Program
- Pollution Prevention and Energy Efficiency Leadership Goals, memo 11-12-99
- Commitment to Implement the Secretary's Pollution Prevention and Energy Efficient Leadership Goals, memo 11-30-00

d. *Measurement Parameters.* The following performance measures will be added to Section 4:

- Sanitary waste reduction percentage (waste generation compared to the 1993 baseline)
- Recycling percentage (quantity of waste recycled divided by quantity of waste generated)
- Percentage of EPA-designated items acquired with recycled content (dollars, spent on the items with recycled content divided by total dollars spent on the items).

e. *Uncertainties of Issues:* The information contained in this Section regarding ISO-14000 will be deleted and the Section marked Not applicable.

Justification: The above added DOE/NV Directive and Executive Orders were, for the most part, issued after the NV-WSS were initially established in 1995 and 1996. Recently, April 2000, the White House issued Executive Order 13101 which superseded Executive Order 12873, Federal Acquisition, Recycling and Waste Prevention (was included as an NV-WSS). As the NV-WSS for pollution prevention were being revised, it was found that various other Executive Orders regarding waste minimization and pollution prevention had not been identified as WSS. The new Executive Order 13101 was designed to expand and strengthen the Federal government's commitment to recycling and buying recycled content, and environmentally preferable products (including bio-based products).

Baseline Change Request Log

Cost Impact: Cost impacts were not considered significant or in contention as the DOE/Contractor approved manual currently exists.

Schedule Impact: Schedule was not considered in contention as a result of this change.

Impact on the work if Change is not Made: DOE/NV will not have established the necessary basis of requirements for meeting agency responsibilities for pollution prevention which were established by Executive Order.

Attachments: DOE M 450.X3, CRD, Pollution Prevention Manual, is available from the DMC Home Page (see NV Home Page draft directives). This change should be read along with the existing Format 1 for WBS 4.5, Environmental Protection Program, because the existing Format 1 is lengthy and contains numerous other laws and regulations.

WBS: 4.5 **Standard Number:** Memorandum Dated 11-30-00

WBS: 4.5 **Standard Number:**

WBS: 4.5 **Standard Number:** Executive Order 12873

WBS: 4.5 **Standard Number:** NV M 450.X3, CRD

WBS: 4.5 **Standard Number:**

WBS: 4.5 **Standard Number:** DOE O 5400.1

WBS: 4.5 **Standard Number:** 40 CFR 247

WBS: 4.5 **Standard Number:** Memorandum Dated 11-12-99

WBS: 4.5 **Standard Number:**

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WBS: 4 5	Standard Number:
WBS: 4 5	Standard Number: Executive Order 13101
WBS: 4.5	Standard Number: RCRA
WBS: 4 5	Standard Number: Executive Order 13148

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BCR: 2001-003 List B2 and B3, Deletion of DOE/NV M 410.X, CRD, Erroneously included in

Approval Date: 12/13/2000

Disapproved:

Note: this BCR was revised to correct editorial issues 11/16/2000 by the originator. No substantive changes were made from the prior version dated 10/30/2000. MPK.

Description: This BCR is to correct an error (NV M 410.X or :XA should have been deleted from List B2/B3) when BCR 2000-012 was developed and approved 8/16/2000. The need for this BCR was first identified in the NV CRG 8/16/2000 Meeting Minutes. The BCR 2000-012 should have deleted DOE/NV M 410.X, CRD Task Plan and Change Control, from the Lists B2 and B3. The NV Directive M 410.X (or M 410.XA) should not have been included in the B2 and B3 lists (initially added by BCR 2000-004). BCR-2000-004, approved 3/1/2000, added the Directive along with six other directives when the B2 and B3 lists were first used, instead of WBS 1.8, Administrative Systems and Controls, to communicate DOE and DOE/NV Directives which DOE/NV was mandating on all organizations complex-wide (including laboratories) for work in Nevada. Previous to the BCR action in 312000, the Lists B2 and B3 were used officially to define DOE Directives applicable to the BN and WSI contracts applicable to categories of work exempted in 1996 from the DOE/NV WSS closure process.

DOE/NV M 410.X(or M 410.XA) should not have been included in BCR 2000-004 because the Directive is applicable to the DOE/NV, the Performance-Based Management Contractor and Service Contractors (BN and WSI). The Directive is not applicable to customers or the National Laboratories as erroneously assumed in BCR 2000-004.

In addition, DOE/NV M 410.X, CRD, was erroneously identified as a mandated Directive by DOE/NV to DOE/OAK; but, DOE/OAK did not include DOE/NV M 410.X, CRD in the LLNL contract. DOE/NV M 410.X, CRD was identified as a mandated Directive by DOE/NV to DOE/AL; however, DOE/AL did erroneously include DOE/NV M 410.X, CRD in the LANL and SNL contracts based on the DOE/NV request. This BCR change will initiate action to correct the erroneous action.

Recommended Action by the CRG: By NV-CRG acceptance of this BCR,

- DOE/NV M 410.X, CRD will be deleted from the Lists B2 and B3. (The Directive, which was updated to NV M 410.XA, CRD, will continue to apply to BN and WSI because it is included in WBS 1.8, per BCR 2000-012).*
- A DOE/NV letter will be prepared notifying DOE/OAK and DOE/AL of this erroneous inclusion of DOE/NV M 410.X, CRD on List B2 and B3, and request that it be deleted from laboratory contracts.*

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Justification: This change corrects an administrative error; the erroneous application of a DOE/NV Directive intended for DOE/NV contractors only and not to National Laboratories conducting work in Nevada.

Cost Impact: Cost impacts were not considered significant or in contention as the DOE/Contractor approved manual currently exists.

*Schedule Impact: Schedule was not considered in contention as a result of this change.
Impact on the work if Change is not Made: N/A.*

Attachments: DOE M 410.X, CRD, Task Plan and Change Control is available from the DMC Home Page (see NV Home Page Archived Directives).

WBS: R2 **Standard Number:** NV M 410.X, CRD

WBS: R3 **Standard Number:** NV M 410.X, CRD

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BCR: 2001-003 Deletion of DOE/NV M 410.X CRD, Erroneously included in List B2 and B3

Approval Date:

Disapproved:

NOTE: See BCR 2001-003a.

Description: The BCR is to correct an error of omission when BCR 2000-012 was developed and approved 8/16/2000. The need for this BCR was first identified in the NV CRG 8/16/2000 Meeting Minutes. The BCR should have deleted DOE/NV M 410.X, CRD Task Plan and Change Control, from the Lists B2 and B3. The NV Directive M 410.X (nor M 410.X4) should not have been included in the B2 and B3 lists (initially added by BCR 2000-004). BCR-2000-004, approved 3/1/2000, added the Directive along with six other directives when the B2 and B3 lists were first used in WBS 1.8, Administrative Systems and Controls, to communicate DOE and DOE/NV Directives which DOE/NV was mandating on laboratories for work in Nevada. Previous to this action in 312000, the Lists B2 and B3 were just used officially to define DOE Directives applicable to the BN and WSI contracts.

DOE/NV M 410.X(nor M 410.XA) should not have been included because the Directive is applicable to the DOE/NV, the Performance-Based Management Contractor and Service Contractors (BN and WSI). The Directive is not applicable to customers or the National Laboratories as erroneously assumed in BCR 2000-004.

In addition, DOE/NV M 410.X, CRD, was erroneously identified as a mandated Directive by DOE/NV to DOE/OAK; but, DOE/OAK did not include DOE/NV M 410.X, CRD in the LLNL contract. DOE/NV M 410.X, CRD was identified as a mandated Directive by DOE/NV to DOE/AL; however, DOE/AL did erroneously include DOE/NV M 410.X, CRD in the LANL and SNL contracts based on the DOE/NV request.

Recommended Action by the CRG: By NV-CRG acceptance of this BCR,

- DOE/NV M 410.X, CRD will be deleted from the Lists B2 and B3. (The Directive, which was updated to NV M 410.XA, CRD, will continue to apply to BN and WSI because it is included in WBS 1.8, per BCR 2000-012 DOE/NV M 410.X, CRD on List B2 and B3, and request that it be deleted from laboratory contracts.*
- A DOE/NV letter will be prepared notifying DOE/OAK and DOE/AL of this erroneous inclusion of DOE/NV M 410.X, CRD on List B2 and B3, and request that it be deleted from laboratory contracts.*

Justification: This change corrects an administrative error; the erroneous application of a DOE/NV Directive intended for DOE/NV contractors only and not to National Laboratories conducting work in Nevada.

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Cost Impact: Cost impacts were not considered significant or in contention as the DOE/Contractor approved manual currently exists.

Schedule Impact: Schedule was not considered in contention as a result of this change.

Impact on the work if Change is not Made: N/A.

Attachments: DOE M 410.X, CRD, Task Plan and Change Control is available from the DMC Home Page (see NV Home Page Archived Directives).

WBS: R2 **Standard Number:** NV M 410.X, CRD

WBS: R3 **Standard Number:** NV M 410.X, CRD

Baseline Change Request Log

BCR: 2001-002 New Format 1, WBS 1.9 Classification of Information

Approval Date: 12/13/2000

Disapproved:

Description: This change request is for the adoption of a Format 1 for the new WBS Element 1.9, Classification of Information.

In 1996, when DOE/NV was applying the Necessary & Sufficient (WSS) Closure Process to all DOE/NV complex-wide work activities, NV management officials exempted the category of work activities associated with Classification of Information from application of the closure process. At that time, Classification of Information requirements were limited to the identification of DOE Directives in contracts. The directives applicable to Classification of Information were included in List B2 for appropriate contracts and agreements.

Recently, the NV/CRG chartered a Classification of Information Standards Identification Team (SIT). The SIT has applied the NV-WSS closure process as defined in DOE/NV M 450.3XA, DOE/NV WSS Manual, and developed a Format 1 to document the information and basis for incorporating the applicable laws, regulations, and DOE Directives, and other standards in DOE/NV contracts and agreements. The Format 1 was developed by a SME and reviewed and accepted by an Independent Reviewer and is ready for CRG review and adoption as part of NV-WSS.

In addition, List B2 is being revised to delete reference to Classification of Information as a category of work exempted from the WSS closure process. Also, DOE O 5650.26, Classification of Information, will be deleted from the List B2. DOE O 5650.26 was the predecessor directive to and was canceled by DOE M 475.1-1, same title. DOE M 475.1-1 is included in Section 3 of the Format 1 for the new WBS element 1.9.

The following information should be noted:

- There is another DOE Order (DOE O 471.1, CRD, Identification and Protection of Unclassified Controlled Nuclear Information) currently on List B2 and B3 that is also included as a standard on WBS 1.9, but is not being deleted from List 82/83. This order is not being deleted from List B2 and B3 at this time because it is also related to and will be addressed by the Safeguards and Security of SNM SIT. This order deals with identification and "Protection". Protection is that part of the task assigned to the Safeguards and Security SIT.*
- BN has a Classification Officer. For WSI, the DOE/NV Classification Officer serves as their Classification Officer.*

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- Since DOE/NV uses the B2 and B3 lists as a means to communicate the Directives DOE/NV mandates as applicable to national laboratories conducting work in Nevada and the National laboratories have authorized Classifiers working in Nevada; the laboratory Classification Officers are accountable to and comply with requirements established by other operations offices, not DOE/NV. These other operations offices are responsible for oversight of this function, not DOE/NV.

Recommended Action by the CRG: By the NV/CRG's acceptance of this BCR, the following recommended changes will be made:

- a. The Appendix to the BN and WSI contracts which addresses NV WSS and B Lists will be revised to delete reference to Classification of Information as a category of work activities that was exempted from the DOE/NV Necessary and Sufficient Closure Process. This; change must be made in the contracts and also in the Contract Appendix Information Section which is provided for reader information on the NV-WSS Home Page.
- b. DOE O 5650.2B will be deleted from List B2.
- c. The Format 1 for the new WBS element # 1.9, Classification of Information, will be added to NV-WSS.
- d. Retire the Classification of Information SIT.

Justification: The DOE/NV CRG established the task and Charter for the Classification of Information Standards Identification Team (SIT). This SIT was one of several SITS Chartered and tasked to prepare Format 1s which collectively will allow for the elimination of List B2 and B3 from DOE/NV contracts and agreements by the establishment of Format 1s in NV-WSS, using the WSS closure process. The Classification of Information SIT has produced the Format 1 and completed its task consistent with the approved Charter and DOE/NV M 450.3XA, WSS Manual. Upon adoption of the Format 1 for Classification of Information, as NV WSS, the Classification of Information SIT Chartered by the NV CRG can be retired.

Cost Impact: Cost impacts are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact: Schedule improvement or slippages as a result of this requested changes are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change is not Made: The DOE/NV and contractors would not have consensus agreement on the applicable laws, executive Orders, regulations, and DOE Directives applicable to contract work on a

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mandatory basis.

Attachments: The Format 1 is being provided with this BCR by Email, the DOE Orders and manuals cited on the Format 1 are available from the DMC Home Page, the Executive Order and the AEA are available through the White House Home Page.

WBS: 1.9	Standard Number: DOE M 471.1-1
WBS: 1.9	Standard Number: DOE O 471.1A, CRD
WBS: 1.9	Standard Number: Executive Order 12958
WBS: 1.9	Standard Number: 10 CFR Part 1017
WBS: 1.9	Standard Number: 42 USC 2011, et seq.
WBS: 1.9	Standard Number: DOE M 475.1-1, CRD
WBS: B2	Standard Number: DOE O 5650.2B

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BCR: 2001-001 Updated Directive, Lessons Learned Program, WBS 1.8 Administrative Systems and Controls and List B2 and B3

Approval Date: 3/19/2001

Disapproved:

Description: This change adopts the most current DOE/NV Directive (adds NV O 230.XA, CRD, a draft pending final approval which will cancel NV O 230.X, CRD) regarding the Lessons Learned Program, as a requirements document of NV-WSS. The change will also be made to the DOE Directives List B2 and B3 which are applicable to the National Laboratories. The proposed draft DOE/NV O 230.XA, CRD, DOE/NV Lessons Learned Program, contains minor clarifications and revisions. The Technical Standard, DOE-STD-7501-99, is identified in the CRD as a Guide (not a requirement) because it is the only authoritative DOE Complex-wide document available which presents DOE expectations for DOE Lessons Learned Programs.

Recommended Action by the CRG: It is recommended that the CRG adopt the most current revision to the DOE/NV Lessons Learned Program Directive as an NV-WSS. The listed DOE Directive number will be changed in Section 3 in WBS element 1.8, Administrative Systems and Controls. The Directive number will also be changed in List B2 and B3. Upon approval of this changes to the List B2 and B3, DOE/NV will issue a request to DOE/AL and DOE/OAK that the Directive be added to the laboratory contracts for application in Nevada.

Justification: This change is to update NV-WSS regarding contractor requirement defined in the DOE/NV Directive.

Cost Impact: Cost impacts are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact: Schedule improvement or slippages as a result of this requested changes are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change is not Made: The interface and relationship of contractors assigned various parts of the DOE/NV Lessons Learned Program would not be communicated to all NV contractors, laboratories, other federal agencies, and users in an authoritative and systematic manner. Specific contractors would know their assigned role as defined in their contracts, but the others conducting operations at NTS would not have an authoritative source DOE/NV document which systematically provides and officially communicates such information.

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Attachments: draft DOE/NV O 230.XA, CRD, DOE/NV Lessons Learned Program, is currently maintained available on the DOE/NV Home Page with the DMC draft Directives.

WBS: 1 8	Standard Number: NV O 230.X, CRD
WBS: 1 8	Standard Number: NV O 230.XA, CRD
WBS: B2	Standard Number: NV O 230.XA, CRD
WBS: B2	Standard Number: NV O 230.X, CRD
WBS: B3	Standard Number: NV O 230.XA, CRD
WBS: B3	Standard Number: NV O 230.X, CRD

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BCR: 2000-019 Delete NV O 450.4 CRD, not applicable to Laboratories

Approval Date: 12/13/2000

Disapproved:

Description: This change deletes DOE NV O 450.4, Safety Management System Maintenance, CRD, dated 08-22-2000, from List B2 and List B3. This order was included in BCR-2000-014 in error and added the Directive to the List B2 and B3. While the order applies to DOE/NV Contractors with DEAR Clause 970-5204-2 and DTRA, it does not apply to the national laboratories (contracted through other operations offices). This was made clear in the Applicability section of the Directive and the Contractor Requirements Document. Requirements of the Order which apply to DOE/NV federal staff provide for DOE/NV correspondence to be developed and transmitted to DOE/OAK and DOE/AL for the action of their responsible DOE federal Contracting Officials, regarding national laboratories conducting work in Nevada.

Recommended Action by the CRG: It is recommended that the List B2 and B3 be changed - delete DOE/NV O 450.4, CRD.

Justification: This change corrects an administrative error made in the BCR 2000-014. The Directive CRD, as written, was not intended to be applicable to the National Laboratories.

Cost Impact: Cost impacts were not considered significant or in contention as the DOE/Contractor approved manual currently exists.

Schedule Impact: Schedule was not considered in contention as a result of this change.

Impact on the Work if Change is not Made: N/A.

Attachments: DOE/NV O 450.4, CRD, Safety Management System Maintenance (see NV Home Page).

WBS: B2 Standard Number: NV O 450.4, CRD

WBS: B3 Standard Number: NV O 450.4, CRD

Baseline Change Request Log

BCR: 2000-018 WBS 3.3, Aviation

Approval Date: 3/19/2001

Disapproved:

Description: This change adds DOE O 440.2, CHG 2 Aviation, CRD, dated 10-26-95 to NV-WSS. The Order, CRD, requires the contractor, in consultation with DOE to establish requirements to address: the training program, flight and duty time limitations, personnel qualifications, aircraft maintenance requirements, flight-following procedures. The Order also requires contractors to ensure aviation safety documentation is developed and approved for each mission mat has risks not normally accepted by the public.

Recommended Action by the CRG: It is recommended that the WBS 3.3, Aviation, Format 1 be changed as follows:

- Section 1, Work Activity. Revise the first sentence to read, "This work activity involves providing aircraft and aviation support, including charter and leased aircraft operations, to the government programs under the purview of the DOE."*
- Section 3, Standards. Add DOE O 440.2, CHG 2, Aviation, CRD.*
- Section 5, Implementation Considerations: Revise the last sentence of the first paragraph to, "A contractor Aviation Operations Manual is used to document the CRD specified requirements, established in consultation with the DOE."*

Justification: Although the requirements of the DOE Order were not previously specified as NV-WSS, the Contractor responsible for NV aviation operations and the Aviation Manager, DOE/NV, have been maintaining the manual as though it were a mandatory requirement. The changes to the Format 1 have been developed by Gary Snodgrass and Tom Conley DOE." They served as the qualified Subject Matter Expert and independent Reviewer, respectively, and documentation is on file with WSS records.

Cost Impact: Cost impacts were not considered significant or in contention as the Contractor manual, documenting the requirements, established in consultation with DOE, is currently in use.

Note: This BCR was revised to resolve the concerns for Tri Lab work.

Schedule Impact: Schedule was not considered in contention as a result of this change.

Impact on the work if Change is not Made: The contractor was already following the requirements for the manual, even though the DOE Directive was not included as a NV-WSS. If this change was not made, NV-WSS w

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It did not be consistent with the DOE/NV Aviation Manager's expectation, and the requirements, agreed to by the contractor and DOE/NV and documented in the contractor's aviation operations manual, would not be considered contract binding.

Attachments: DOE O 440.2, Aviation, CHG 2, CRD, is available on the internet through the DMC. The RSL Aviation Services Operations Manual is a controlled document, and is available on the BN Home Page at <http://bnhome/rslavs/manual/toc.htm>.

Note: this BCR was revised per R. Riders proposal and agreed to by J. Ginanni and Tom Conley, EMD/NV (see initials by G. Snodgrass signature above). J. Ginanni has taken over G. Snodgrass' function regarding the Aviation program for NV.

WBS: 3.3

Standard Number: DOE O 440.2, Chg 2, CRD

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BCR: 2000-017 WBS 1.2.3 Specialty Area (finance), Cancellation and replacement Directive, DOE O 551.1A, CRD, Official Foreign Travel

Approval Date: 12/13/2000

Disapproved:

Description: This change request provides for adoption of DOE Order O 551.1A, Official Foreign Travel, CRD, as an NV-WSS for WBS 1.2.3 Specialty Areas (Finance), regarding official foreign travel by contractor employees. DOE O 551.1, currently adopted as the NV-WSS, was canceled and replaced by DOE O 551.1A; therefore, reference to DOE O 551.1 should be deleted from NV-WSS.

Recommended Action by the CRG: The following actions are recommended regarding WBS 1.2.3, Specialty Areas (Finance) Format 1:

- Add DOE O 551.1A, CRD, Official Foreign Travel
- Delete DOE O 551.1, CRD, Official Foreign Travel

Justification: The NV-WSS adopted has been changed by the Department. Also, the new Order reflects the applicability of the requirements of the Order to the National Nuclear Security Administration.

Cost Impact: Costs are not in contention regarding this change.

Schedule Impact: Schedule impacts are not in contention regarding this change.

Impact on the work if Change is not Made: Contractor financial controls on foreign travel would not be required to conform to current DOE requirement. The Order serves as the DOE'S standard for controls on financial and other matters applicable to contractors, when they are required to travel to foreign countries. There is no suitable standard in industry which would provide the requirements needed to address DOE management's specific foreign travel issues and concerns.

Attachments: DOE O 551.1A, Official Foreign Travel, CRD, dated 8-25-00

WBS: 1.2.3 Standard Number: DOE O 551.1, CRD

WBS: 1.2.3 Standard Number: DOE O 551.1A, CRD

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BCR: 2000-016 Emergency Management Program and System, WBS 4.8, and List B2/B3

Approval Date: 12/14/2000

Disapproved:

Description: This change adds DOE/NV O 151.1, CRD, Comprehensive Emergency Management System to WBS 4.8, Emergency Management Program and Systems, and Lists B2 and B3. This directive provides local clarification of applicable sections of the DOE Directive O 151.1 and other requirements and interface relationships assigned to DOE/NV contractors, national laboratories, and other users.

Recommended Action by the CRG: By acceptance of this proposed change request:

A. All contractors, national laboratories, other federal agencies, and other users of DOE/NV real estate shall be required to conform to the Directive requirements as a part of NV-WSS as incorporated into their contracts or as defined on List B2/B3 per agreements with the national laboratories.

B. The specific roles and interface relationships for the Emergency Management Program and requirements for operation of the emergency management capability shall be recognized as assigned to the Performance Based Management Contractor (BN).

C. The specific roles and requirements for operation of the DOE/NV Emergency Operations Center shall be recognized as assigned to the Management and Technical Support Services contractor, (PAI.)

Justification: This directive clarifies local roles, requirements, and interface relationships between the various DOE/NV contractors involved in operation of DOE/NV's Emergency Management Program. It clarifies which DOE, CRD requirements have been adopted for implementation at DOE/NV and requires certain documents to be provided by organizations operating on DOE/NV real estate to DOE/NV, so the federal responsibilities to integrate the emergency management system can be accomplished in a systematic manner. Lack of this local direction was identified in a recent assessment as an opportunity for improvement of DOE/NV's Emergency Management system.

Cost Impact. Cost impacts are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippages as a result of this requested changes are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

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Impact on the Work if Change is not Made: The interface and relationship of contractors assigned various parts of the DOE/NV Emergency Management Program would not be communicated to all contractors, laboratories, other federal agencies, and users in an authoritative and systematic manner. Specific contractors would know their assigned role as defined in their contracts, but the others conducting operations at NTS would not have an authoritative source DOE/NV document which systematically provides and officially communicate such information.

Attachments: draft DOE/NV O 151.1, CRD, Comprehensive Emergency Management System, dated 11/14/00, is currently maintained available on the DOE/NV Home Page with the DMC draft Directives.

WBS: 4 8 **Standard Number:** NV O 151.1, CRD

WBS: B2 **Standard Number:** NV O 151.1, CRD

WBS: B3 **Standard Number:** NV O 151.1, CRD

Baseline Change Request Log

BCR: 2000-015 Consolidation of Radioactive Waste WBS Elements into WBS 2.1.7 Radioactive Waste and Re-definition of Standards

Approval Date: 8/24/2000

Disapproved:

Description: This proposed change consolidates three WBS elements (2.1.5, 2.1.6, and 2.1.7) into one WBS element (2.1.7), Radioactive Waste as defined on a new Format 1, attached.

Recommended Action by the CRG. CRG approval of this change will:

- Delete WBS 2.1.5, TRU Waste, 2.1.6, Mixed Waste
- Establish WBS 2.1.7, Radioactive Waste (new title) as defined on a new Format 1.

Justification. As a result of review, updating, and consolidation of the WBS elements dealing with radioactive waste, some standards were deleted, some were updated, and some were added to the NV-WSS as defined in Section 3 Standards, of the new WBS 2.1.7, Radioactive Waste. The most significant change was the deletion of DOE Directive 5820.2A and addition of NV M 435.1, CRD, Radioactive Waste Management Manual to address current waste management requirements.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in WSS and by reference in applicable contracts and agreements.

Attachments. New Format 1, WBS 2.1.7, Radioactive Waste.

WBS: 2.1.5 Standard Number:

WBS: 2.1.6 Standard Number:

WBS: 2.1.7 Standard Number:

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WBS: 2.1.7 **Standard Number:** 29 CFR 1910

Baseline Change Request Log

BCR: 2000-014 WBS 1.8 Administrative Systems and Controls and Lists B2 and B3, added new and revised NV Directives which reflect the Phase 1 Verification Corrective Action Plan applicable to contractors and labs

Approval Date: 8/22/2000

Description: This change adds the following new and revised (directives to WBS 1.8 Administrative Systems and Controls and List B2 and List B3:

Disapproved:

New NV Directives:

- DOE/NV M 210.X, CRD, Contractor Performance Administration
- DOE/NV M 412.X2, CRD, Readiness Reviews
- DOE/NV O 412.X3, CRD, Work Controls
- DOE/NV O 450.4, CRD, Safety Management Systems Maintenance

Revised or changed NV Directives (including one DOE Standard mandated in the Directive CRD):

- DOE/NV M 220.XA, CRD, DOE/NV Oversight Management System (no change to CRD)
- DOE/NV M 412.XA, CRD, Project Screening and Location Approval Process (no change to CRD)
- DOE/NV M 412.XIB, CRD, Real Estate/Operations Permit
- DOE/NV M 450.XA, CHG 1, CRD, Authorization and Activity Agreements for Facilities and Operations
- DOE/NV M 450.3XA, CRD, Work Smart Standards Manual

These directives define requirements and processes for the DOE/NV Safety Management System and were developed or modified as a result of Corrective Action Plans as a result of opportunities for improvement identified in the NTS ISMS Phase 1/11 Verification, Report dated July 2000.

Recommended Action by the CRG. By acceptance of this proposed change request:

- A. BN and WSI will be required to conform to the requirements of the CRDs attached to the above listed DOE/NV directives by contract regarding the various subject matter.
- B. The national laboratories will be required to conform to the requirements of the CRDs attached to the above listed DOE/NV directives by List B2 and 63 being provided to DOE/AL and DOE/OAK, regarding the various subject matter.
- B. The Format 1 for WBS 1.8, Administrative Systems and Controls will be changed as follows:
 - Add to section 1, Work Activities. This work activity includes: Planning and Budget Prioritization of ES&H

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Activities, Contractor Performance Administration, Work Controls, Readiness Reviews, and Safety Management Systems Maintenance.

- Add to Section 2, Hazards and Management Issues. Implementation of DOE/NV processes regarding: Planning and Budget Prioritization of ES&H Activities, Contractor Performance Administration, Work Controls, Readiness Reviews, and Safety Management Systems Maintenance are considered management issues which demand efficient and effective process definition, control, and execution.

- Add to Section 3, Standards. Add the four listed new DOE/NV Directives and five revised designation numbered Directives and the one DOE Technical Standard to the Standards Set.

C. The Lists B2 and B3 will be changed to add the four new NV Directives and revise the designation number for the five revised or changed NV Directives as listed above.

Justification. The above listed DOE/NV Directive CRDs are a part of the DOE/NV Directive System used to communicate mandatory requirements to contractors (CRDs). These Directives document the DOE/NV processes considered necessary and sufficient to accomplish the DOE/NV mission with support and participation of the contractors, laboratories, and others. These documents provide a basis for understanding of NV systems by the Federal employees, contractors, laboratories, and external regulatory or audit organizations. These documents also provide a means for assessing opportunities for improvement and changes to the established mechanisms. The Phase I/II Verification Report was used to develop a corrective action plan which resulted in improvements in (or the creation of new) the DOE/NV directives listed above.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in NV-WSS and binding by reference in applicable contracts and agreements.

Attachments. See the above list of DOE/NV draft documents are all available on the DOE/NV Home Page under the DMC, DOE/NV Directives, (click on Drafts).

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WBS: 1.8	Standard Number: NV M 210.X, CRD
WBS: 1.8	Standard Number: NV M 412.X2, CRD
WBS: 1.8	Standard Number: NV M 450.3XA, CRD
WBS: 1.8	Standard Number: NV M 412.X1B, CRD
WBS: 1.8	Standard Number: NV M 412.XA, CRD
WBS: 1.8	Standard Number: NV M 220.XA, CRD
WBS: 1.8	Standard Number: NV O 450.4
WBS: 1.8	Standard Number: NV M 450.XA, Chg 1, CRD
WBS: 1.8	Standard Number: NV O 412.X3, CRD
WBS: B2	Standard Number: NV M 210.X, CRD
WBS: B2	Standard Number: NV M 450.XA, Chg 1, CRD
WBS: B2	Standard Number: NV O 412.X3, CRD
WBS: B2	Standard Number: NV M 412.X1B, CRD
WBS: B2	Standard Number: NV M 412.XA, CRD
WBS: B2	Standard Number: NV M 220.XA, CRD
WBS: B2	Standard Number: NV O 450.4

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WBS: B2	Standard Number: NV M 412.X2, CRD
WBS: B2	Standard Number: NV M 450.3XA, CRD
WBS: B3	Standard Number: NV M 450.3XA, CRD
WBS: B3	Standard Number: NV M 220.XA, CRD
WBS: B3	Standard Number: NV M 412.X1B, CRD
WBS: B3	Standard Number: NV M 210.X, CRD
WBS: B3	Standard Number: NV M 450.XA, Chg 1, CRD
WBS: B3	Standard Number: NV M 412.XA, CRD
WBS: B3	Standard Number: NV O 412.X3, CRD
WBS: B3	Standard Number: NV O 450.4
WBS: B3	Standard Number: NV M 412.X2, CRD

Baseline Change Request Log

BCR: 2000-013 WBS 1.8, Administrative Systems and Controls and List B2/B3, Add DOE M 140.1-1A, Interface with the Defense Nuclear Facility Safety Board

Approval Date: 12/13/2000

Replaces BCR 2000-013.

Disapproved:

Description: This change adds DOE M 140.1-1A, CRD, Interface with the Defense Nuclear Facility Safety Board, to WBS 1.8, Administrative Systems and Controls. This CRD requires use of the processes defined in the manual to ensure organization, control, and consistency of Department and contractor interactions with the DNFSB and staff personnel.

Recommended Action by the CRG. By acceptance of this proposed change request:

A. BN and WSI will be required to conform to the requirements of the CRD regarding interface with the DNFSB.

B. The Format 1 for WBS 1.8 Administrative Systems and controls will be changed as follows:

- Add to Section 1, Work Activity: This work activity includes contractor and national laboratories work in support on interface actions between the DOE and the DNFSB.

- Add to Section 2, Hazards and Management Issues: DOE and DOE contractor interface actions must be organized, controlled, and implemented in a manner which meets DOE obligations to interface with the DNFSB and staff in a timely and effective manner.

- Add to Section 3, Standards: DOE M 140.1-1A, CRD, Interface with the Defense Nuclear Facility Safety Board.

Justification. Interface between DOE and DNFSB includes: DNFSB Recommendations and Responses, Implementation Planning, Safety Issues Management, Correspondence Management, Other Communications, Site Interfacing, and Annual Reporting to Congress. The DOE M 140.1-1A Manual establishes the requirements, organizations, and mechanisms by which interface actions can be accomplished in a uniform, timely, and effective manner by all elements of the department DOE Complex-wide.

The CRD has been designed for use in establishing these requirements in DOE contracts and agreements, where applicable.

Cost Impact: Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

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Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in NV-WSS and by reference in applicable contracts. Headquarters could not be assured by the Manager that, DOE/NV contractors conducting work on DOE/NV controlled property will comply with headquarters mandated interface mechanism to ensure effective relationships and communications are controlled between DOE and contractors and the staff of the DNFSB.

Attachments. DOE M 140.1-1A, CRD, Interface with the Defense Nuclear Facility Safety Board, dated 01-26-99, is an approved DOE Directive maintained on the DMC Home page under Headquarters Directives.

Note: This BCR initially proposed adding DOE M 140.1A, CRD, to WBS 1.8 and List B2 and B3. Due to a general issue raised by R. Higgs this BCR was approved 11/15/2000 with the exception that reference to List B2 and B3 be deleted. This note provides for the possible future consideration of a change which may be determined necessary in the future to address how DOE/NV mandates applicability of DOE M 140.1A, CRD, to national laboratories for NTS. The general issue of ES&H requirements documents raised by R. Higgs, 11/15/2000 is pending resolution by the CRG Chairman. An action item for the CRG has been established to track the possibility for an additional BCR to be required to address applicability of the M 140.1A to national laboratories at NTS.

WBS: 1 8

Standard Number: DOE M 140.1-1A, CRD

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BCR: 2000-013 WBS 1.8 Administrative Systems and Controls and List B2/B3, Add DOE M 140.1-1A, Interface with the Defense Nuclear Facility Safety Board

Approval Date: 12/13/2000

Disapproved:

NOTE: By Director of the NV CRG, the national labs were deleted and this directive is not to be added to Lists B2 and B3. Mitch Kunich 11/16/2000. See BCR 2000-013a.

Description: This change adds DOE M 140.1-1A, CRD, Interface with the Defense Safety Board, to WBS 1.8, Administrative Systems and Controls, and List B2 and List and List B3. This CRD requires use of the processes defined in the manual to ensure organization, control, and consistency of Department and contractor interactions with the DNFSB and staff personnel.

Recommended Action by the CRG. By acceptance of this proposed change request:

A. BN and WSI will be required to conform to the requirements of the CRD regarding interface with the DNFSB.

B. The National Laboratories will be required to conform to the requirements of the CRD regarding interface with the DNFSB for actions in Nevada, therefore the Directives will be added to Lists B2 and and B3.

C. The Format 1 for WBS 1.8 Administrative Systems and controls will be changed as follows:

- Add to Section 1, Work Activity: This work activity includes contractor and national laboratories work in support on interface actions between the DOE and the DNFSB.

- Add to Section 2, Hazards and Management Issues: DOE and DOE contractor interface actions must be organized, controlled, and implemented in a manner which meets DOE obligations to interface with the DNFSB and staff in a timely and effective manner.

- Add to Section 3, Standards: DOE M 140.1-1A, CRD, Interface with the Defense Nuclear Facility Safety Board.

Justification. Interface between DOE and DNFSB includes: DNFSB Recommendations and Responses, Implementation Planning, Safety Issues Management, Correspondence Management, Other Communications, Site Interfacing, and Annual Reporting to Congress. The DOE M 140.1-1A Manual establishes the requirements, organizations, and mechanisms by which interface actions can be accomplished in a uniform, timely, and effective manner by all elements of the department DOE Complex-wide.

The CRD has been designed for use in establishing these requirements in DOE contracts and agreements, where applicable.

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Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in NV-WSS and List B2/B3 and by reference in applicable contracts and agreements. Headquarters could not be assured by the Manager that, DOE/NV contractors and national laboratories conducting work on DOE/NV controlled property will comply with headquarters mandated interface mechanism to ensure effective relationships and communications are controlled between DOE and contractors and the staff of the DNFSB.

Attachments. DOE M 140.1-1A, CRD, Interface with the Defense Nuclear Facility Safety Board, dated 01-28-99, is an approved DOE Directive maintained on the DMC Home page under Headquarters Directives.

WBS: 1.8 **Standard Number:** DOE M 140.1.1A, CRD

WBS: R2 **Standard Number:** DOE M 140.1.1A, CRD

WBS: R3 **Standard Number:** DOE M 140.1.1A, CRD

Baseline Change Request Log

BCR: 2000-012 WBS 1.8 Administrative Systems and Controls, Revised Directives NV O 124.X, CRD and M 410.XA, CRD

Approval Date: 8/22/2000

Disapproved:

Description: This change has two parts to address actions regarding the two directives:

- DOE/NV O 124.X, CRD, Planning and Budget Prioritization of Work is proposed to be added to WSS WBS 1.8, and
- DOE/NV M 410.XA Task Plan and Change Control, CRD, has been changed and the reference in WSS WBS 1.8 should therefore be revised accordingly.

The change to WBS 1.8 regarding DOE/NV O 124.X, CRD is to provide a prioritization mechanism and defined interface relationship between DOE/NV contractors and DOE/NV Management.

The change to WBS 1.8 regarding NV M 410.M CRD is administrative in nature to maintain references in DOE/NV Work Smart Standards (NV WSS) current with the current DOE/NV Directives. DOE/NV M 410.XA, the "A Revision" to the Directive, has been issued and changed some wording in the CRD. The changes require the Performance Based Management Contractor and the Security Services Contractor to ensure ES&H requirements in contracts and NV-WSS are addressed in cost estimates through discussions with DOE/NV Program/Project Managers.

Recommended Action by the CRG: CRG approval of this BCR will:

A. BN and WSI will be required to conform to the requirements of the CRDs attached to the above listed DOE/NV Directives.

B. WBS 1.8, Administrative Systems and Controls, Format 1 will be modified as follows:

- Section 1, Work Activity. Add, This work activity includes: Planning and Budget Prioritization of Work activities.
- Section 2, Hazards and Management Issues. Add, The need for a prioritization system and defined interface relationship between DOE/NV and contractors is considered a safety related management issue.
- Section 3, Standards. Add, DOE" O 124.X CRD Planning and Budget Prioritization of Work, and revise the designation of the Directive to reflect the "A" revision DOE/NV M 410.X, CRD, i.e., change the citation to

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DOE/NV M 410.XA, CRD, Task Plan and Change Control Process.

Note: these changes do not relate to laboratory work; therefore, the change is not proposed to affect the Directives Lists B2 or B3.

Justification: The above listed CRDs are a part of the DOE/NV Directive System used to communicate mandatory requirement to contractors regarding certain work activity planning standards established between DOE/NV and contractors. The above Directives document the DOE/NV processes and serve as the necessary and sufficient standard to define work prioritization and interface relationships of organizations as they plan, document, and control work and accomplish the the mission and concurrently meet priority safely objectives and cost effectiveness objectives. The mechanism for Budget Prioritization was also identified as an improvement issue in the DOE/NV Phase 7 ISMS Verification, Corrective Action Plan.

Cost Impact: Cost impacts of implementation of the above contractor requirements are not considered significant nor anticipated to be in contention by parties to the DOE/NV contracts.

Schedule Impact: Schedule improvements or slippages as a result of the requested change are not anticipated to be in contention by parties to DOE/NV contracts.

Impact on the Work if Change is not Made. The lack of a prioritization system, if not provided will be identified as a deficiency during Phase II ISMS Verification to be done in September 2000. If references were not maintained current in NV-WSS, DOE/NV would fail to meet the responsibility of the CO, to maintain adequate ES&H requirements in contracts, the credibility of NV-WSS would deteriorate. DOE/NV would eventually be found to have failed to have an effective system to include necessary and sufficient improvements into NV-WSS.

Attachments: Drafts of DOE/NV O 124.X CRD Planning and Budget Prioritization of Work and DOE/NV M 410.M Task Plan and Change Control, are currently maintained on the DMC Home Page with DOE/NV Directives (click on Drafts).

WBS: 1.8 **Standard Number:** NV O 124.X, CRD

WBS: 1.8 **Standard Number:** NV M 410.XA, CRD

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BCR: 2000-011

WITHDRAWN - NO HARD COPY.

Approval Date:

Disapproved:

WBS:

Standard Number:

Baseline Change Request Log

BCR: 2000-010 WBS 4.6 Firearms Safety, correction of reference to DOE O 440.1A, CRD and Add DOE M 473.2-1

Approval Date: 8/22/2000

Disapproved:

Description: This change is to correct the reference in the DOE/NV Work Smart Standards (WSS) to the requirements of a DOE Directive which has been revised. This change also is to add DOE M 473.2-1 to WSS. The existing Format 1 dated 9/30/96 cites DOE O 440.1, CRD, Attachment 1, Functional Area Requirements for DOE Elements, Paragraph 3, Firearms Safety. This citation is not contained in the CRD; therefore, the citation is not appropriate for application to contractors and should be deleted. In addition, the citation to DOE O 440.1, Attachment 2, CRD, Paragraph 15, Firearms Safety, was used in the Format 1 of 9/30/96. The most current and correct reference to the requirements applicable to contractors is DOE O 440.1A, CRD, Attachment 2, Paragraph 16, Firearms Safety.

The requirements were not changed regarding firearms safety by the revision to the Directive O 440.1A, CRD, except for adding a reference to DOE M 473.2-1. Attachment 1, paragraph 3, and Attachment 2, CRD, Paragraph 15 and 16 are all three almost identical, except for one change. DOE O 440.1A, Attachment 2, CRD, paragraph 16, subparagraph 16d(4) now includes a reference to DOE M 473.2-1 as a requirement. It is therefore also proposed that this DOE M 473.2-1 directive be added as a DOE/NV WSS as a part of this change.

Recommended Action by the CRG. CRG approval of this BCR will Change Section 3, Standards, of the Format 1 as follows:

- *Delete reference to DOE O 440.1, Attachment 1, Paragraph 3 as a standard.*
 - *Revise the reference to DOE O 440.1, Attachment 2, Paragraph 15 to DOE O 440.1A, Attachment 2, CRD, paragraph 16, Firearms Safety.*
 - *Add DOE M 473.2-1, Firearms Qualification Courses Manual, as a new DOE/NV WSS.*
- This BCR will change Section 5, Implementation Considerations, and Section 7, Uncertainties or Issues, of the Format 1 as follows:*
- *Revise the reference to "DOE Standards 1091-95 (Firearms Safety Protection)" to the more current DOE Technical Standard "DOE-STD-1091-96, Firearms Safety".*

Justification. This change is administrative in nature and corrects the reference location to current WSS requirements in the DOE Directive System of documents and technical standards of the DOE Technical Standards Program. This change also added the Firearms Qualification Courses Manual as a requirement to be consistent with the requirement in DOE O 440.1A, Attachment 2, CRD, subparagraph 16d(4).

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Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements. The requirements applicable to the contractor are not significantly changed. The contractor has been using the Firearms Qualification Courses Manual as required in DOE O 440.1A, CRD subparagraph 16d(4).

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be properly referenced in WSS to the most current DOE Directive and by reference in applicable contracts and agreements.

Attachments. DOE O 440.1, Worker Protection Management for DOE Federal and Contractor Employees, CRD, Attachment 1 and 2, are currently located in DOE Archives on the DOE/NV Home Page. DOE O 440. 1A, CRD, Attachment 2, is available as a current new series DOE directive on the DOE/NV Home Page.

WBS: 4.6 **Standard Number:** DOE O 440.1, CRD, Attachment 2, Paragraph 3

WBS: 4.6 **Standard Number:** DOE-STD-1091-95

WBS: 4.6 **Standard Number:** DOE M 473.2-1

WBS: 4.6 **Standard Number:** DOE O 440.1A, Attachment 2, Paragraph 16

WBS: 4.6 **Standard Number:** DOE-STD-1091-96

Baseline Change Request Log

BCR: 2000-009 WBS 3.7 Industrial Security, correction reference

Approval Date: 8/22/2000

Disapproved:

Description: This change is to correct the reference in the DOE/NV Work Smart Standards (WSS) to the requirements in a DOE Directive which has been revised. The existing Format 1 dated 4/28/99 cites DOE O 440.1, CRD, Attachment 2, Paragraph 20, Motor Vehicles Safety. The most current and correct reference should be to DOE O 440. 1A, CRD, Attachment 2, Paragraph 21, Motor Vehicles Safety.

The requirements were not changed regarding motor vehicle safety by the revision to the Directive O 440.1A, CRD.

Recommended Action by the CRG. CRG approval of this change will correct a cited reference in WSS to the most current reference in the DOE Directive System.

Justification. This change is administrative in nature and corrects the reference location to current WSS requirements in the DOE Directive System of documents.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be properly referenced in 'WSS to the most current DOE Directive and by reference in applicable contracts and agreements.

Attachments. DOE O 440.1, Worker Protection Management for DOE Federal and Contractor Employees, CRD, Attachment 2, is currently located in DOE Archives. DOE O 440.1A, CRD, Attachment 2, is available on the DOE/NV Home Page.

WBS: 3.7 **Standard Number:** DOE O 440.1A, CRD, Attachment 2, Paragraph 21

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BCR: 2000-008 WBS 1.2.3, Specialty Areas (Finance), Work for Others (non-DOE Funded Work), administrative change to current reference DOE/NV Directive

Approval Date: 8/22/2000

Disapproved:

Description: This change is administrative in nature to maintain DOE/NV Work Smart Standards (WSS) current with current DOE/NV Directives. DOE/NV O 481.1, Work for Others, CRD, is a WSS under WBS 1.2.3, Specialty Area (Finance). Change 1 has been issued to DOE/NV O 481.1. The change is solely related to format and Attachment 2, Acceptance Checklist, (a form). The Form identified as Attachment 2 has been split into two forms and now appears as Attachment 2 and Attachment 3. No changes have been made to the CRD.

Recommended Action by the CRG. CRG approval of this (change will modify WBS 1.2.3 Specialty Areas (Finance) Format 1, Section 3, by deleting DOE/NV O 481.1, CRD and replace it with DOE/NV O 481.1, CHG 1, CRD.

Justification. This change is administrative in maintain WSS current with the current DOE/NV Directives.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work of Change Is Not Made. The most current reference to requirements DOE/NV Management expects to be implemented will not be in WSS and by reference in applicable contracts and agreements.

Attachments. DOE/NV O 481.1, Work for Others CHG 1 (Changed pages only), dated 4/14/2000.

WBS: 1 2 3 **Standard Number:** NV O 481.1, Chg 1, CRD

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BCR: 2000-007 Revisions to DOE/NV Oversight Directive (Change has no affect on CRD)

Approval Date: 3/15/2000

Disapproved:

Description: THIS CHANGE HAS NO AFFECT ON CONTRACTOR REQUIREMENTS DOCUMENTS AND IS PROCESSED THROUGH THE CRG TO MAINTAIN CURRENT DIRECTIVE NUMBERS. This change involves clarification of definitions and DOE responsibilities contained in DOE/NV M 220.X, CHG 1, CRD. The definition regarding "Assessor" was changed to resolve a DOE/NV self assessment concern.

Recommended Action by the CRG. CRG approval of this change will replace the previously approved Directive (DOE/NV M 220.X) with DOE/NV M 220.X, CHG 1, CRD, DOE/NV Oversight Management System, Contractor Requirements Document as the adopted WSS. This change will also be made on List B2 and B3 to reflect the applicability of the most current NV Directive on the National Laboratories.

Justification. The changes that have been incorporated in this Directive only involve the definition of Assessor and responsibilities of DOE. This changes are relatively minor in nature, but have been processed through the CRG for WSS configuration control purposes. The DOE/NV ISMS Self Assessment (Lee McGetrick's concern) was resolved by Roy Capshaw, DOE/NV with the suggested revision to the Directive.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule Impact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. Configuration control of the most current Directives in WSS and B lists would be lost. The most current requirements DOE/NV Management expects to be implemented will not be in WSS and by reference in applicable contracts and agreements with Contractors and National Laboratories.

WBS: B2 Standard Number: NV M 220.X, Chg 1, CRD

WBS: B3 Standard Number: NV M 220.X, Chg 1, CRD

Baseline Change Request Log

BCR: 2000-006 Revision to Real Estate/Operations Permit Directive

Approval Date: 3/15/2000

Disapproved:

Description: This change is needed to reflect the most current DOE/NV Directive regarding Real Estate/Operations Permit (REOP) requirements. DOE/NV M 412.XIA is to replace and cancel DOE/NV M 412.X1. As a part of this change the Contract Requirements Document attached to the Directive has also been changed. The major changes include: requiring BN to maintain a primary REOP for all NV real estate and operations not covered by a primary REOP held by any other authorized organization (i.e., balance of Plant); and defines limits on the organizations authorized to be issued primary Real Estate/Operations Permits to: DOE/NV; National Laboratories; (LLNL, LANL, and SNL); DTRA; Bechtel Nevada, Inc.; Wackenhut Services, Inc.; and International Technologies, Inc. The revised directive requires organizations assigned a primary RE/OP Permit to maintain safety coordination responsibility and concur on secondary REOP holder's documentation and ensure the proposed work does not conflict with the primary REOP authorization basis. The primary REOP holder is required to conduct an independent safety review for all secondary REOPs where the proposed work is to be performed by an organization not specified above and potentially involves high consequence hazards.

Recommended Action by the CRG. CRG approval of this change will add DOE/NV M 412.XIA, CRD to the WBS element 1.8, Administrative Control, List B2, and List B3 and delete DOE/NV M 412.X1 from WBS 1.8, List B2, and List B3.

Justification. This change does not involved new work description, hazards, or management issues. This change includes requirements DOE/NV believes are needed for safe and effective management and control of operations by authorized organizations.

Cost Impact. Cost impact are not considered significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Schedule ImPact. Schedule improvement or slippage as a result of the requested change are not significant nor anticipated to be in contention by parties to DOE/NV contracts or agreements.

Impact on the Work if Change Is Not Made. The most current requirements DOE/NV Management expects to be implemented will not be in WSS and by reference in applicable contracts and agreements.

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Attachments. DOE/NV M 412.X1A, Real Estate/Operations Permit, is available from the DOE/NV DMC Home Page.

WBS: 1 8 **Standard Number:** NV M 412.X1A, CRD

WBS: B2 **Standard Number:** NV M 412.X1A, CRD

WBS: B3 **Standard Number:** NV M 412.X1A, CRD

Baseline Change Request Log

BCR: 2000-005 Updated B3 List, Directives applicable to the Device Assembly Facility (DAF)0228

Approval Date: 3/1/2000

Disapproved:

Description. A revised list of DOE Directives applicable to the Device Assembly Facility has been defined to update the list to more current DOE directives, proposed to serve as the basis for a new B3 List for use in DOE/NV contracts and agreements with DOE/NV Contractors and the National Laboratories participating in work activities conducted at DAF. The revised list is supported by a documented crosswalk developed by the DAF SIT which serves as their analysis and basis for decisions in arriving at the proposed new B3 List. The "Crosswalk" collectively consists of the "Device Assembly Facility Standards Set," i.e, a summary List; the "Device Assembly Facility Standards Summary Crosswalk table." i.e., a summary table; and the "DAF Basis Order Set Crosswalk Protocol, Volume 1 through 4, Narrative Report, dated December 1998, i.e., detailed analysis and documentation.

It should be noted that, certain CFRs have been identified on the "Device Assembly Facility Standards List." These CFRs were incorporated by reference in the listed DOE Orders and will be adopted as referenced mandatory requirements of the listed Orders. These CFRs will not be identified on the Official DOE/NV B3 List on the DOE/NV Home Page. The B lists, as used for contract purposes, must not be used to identify Laws and Regulations. This in no way diminishes the mandatory nature of the requirements found in the referenced CFRs as defined in DEAR (Clause 970.5204-78, Laws, Regulations, and DOE Directives.

Recommended Action by the CRG: It is recommended that the CRG adopt a new B3 List as the basis for replacement for the current B3 List.

List as currently documented will need to be clarification by the CRG:

- It is recognized that the note at the top of the DAF Standards Set should be deleted. The justification to the BCR is to serve as the needed clarification of applicability of DOE/NV WSS to BN and WSI regarding the requirements applicable to institutional program requirements (Program support services provided NTS site-wide).*
- It is also recognized that BCR 2000-004 (addition of seven DOE/NV directives to the B2 and B3 Lists for the National Laboratories), previously approved by the CRG will be added to the DAF proposed list as DOE/NV establishes the new B3 List on the DOE/NV Home Page for use on contracts and agreements.*

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The new B3 List will be used as “the interim solution” until CRG acceptance of WSS Format 1s which address all the activities conducted in DAF. The scope of the proposed Tri Lab SIT is assumed to be larger than DAF activities.

Justification. One of the tasks established for the DAF SIT was to update the list of DOE Directives used by DOE/NV in contracts. The contractor and DOE Operations Readiness Reviews on DAF have been completed and the DAF SIT was chartered to fulfill the Start up Manager’s (Rick Higgs at the time) commitment to transition DAF from a DOE Orders basis to a WSS basis of requirements. This task, to update the Directives, was established as an interim step because several of the Directives on the existing List B3 had been canceled and/or replaced by new DOE Directives and were no longer considered current, although they remained contract mandated and applicable.

The Crosswalk Table serves as a summary roll up of the supporting documentation, DAF Basis Order Set Crosswalk Protocol Volume 1 through 4 Narrative Report December 1998. The Crosswalk provides the systematic review and documentation basis of decisions to change to new more current and maintained set of Directives. The proposed DAF Standards Set, supported by the Crosswalk fulfills the commitment with basis for DOE/NV to update the B3 List.

The Note at the top of the proposed DAF Standards’ Set states, “Applicable Standards established in the DOE/NV Complex Work Smart Standards set are incorporated without reference.” This note should be deleted for the B3 List. Documentation of its meaning here is sufficient to capture the following understanding as developed by the DAF SIT and supported by the Crosswalk as they formalized their decisions.

- (1) The DAF Crosswalk validated that the prior DOE Directive requirements mapped (were adequately addressed) to new more current DOE Directive requirements;*
- (2) That there is a high level of confidence in the DAF management team that existing DAF implementing plans and procedures are consistent with this new DAF Standards Set;*
- (3) However, DAF management plans that there will be a review, as part of the normal DAF documented biennial review cycle, to review the DAF facility specific implementing plans and procedures against the requirements of the new DAF Standards Set and revised accordingly; and*
- (4) The DAF action requirements and DAF Institutional Program Requirements derived from the old DOE Directives B3 List were adequately addressed by the new DOE Directives and the WSS format 1 sets of*

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requirements and were determined to be consistent by the DAF SIT.

The DAF Standards Set will be taken by DOE/NV and converted to a form suitable for the DOE/NV Home Page and serve as the B3 list for the Interim. The DAF Tri-Lab SIT, separate action of the CRG, will begin the process to provide the long-term solution for the elimination of the B2 and B3 Lists, as they pertain to three categories of exempted activities.

The new B3 List will be used until CRG acceptance of WSS Format 1s which address all the activities conducted in DAF. The scope of the Tri Lab SIT is assumed to be larger than DAF activities and include the DAF SIT scope of work.

Cost Impacts. Cost impact on the work associated with this change is not at issue.

Schedule Impact. Schedule impact on the work associated with this change is not an issue.

Impact on the work if the change is not made: The updating of the B3 List is an interim measure to maintain current requirements applicable to a significant DOE/NV facility. An effort is expected to begin shortly (Tri-Lab SIT) to address a long term solution for the process of defining requirement applicable to laboratories as may be agreed by the Agreement Parties, as may be proposed by subject matter experts and independent reviews on all laboratory work conducting under the purview of DOE/NV.

Attachments. The DOE and DOE/NV Directives and the DOE Technical Standards are available on the DOE internet. The current List B2 and B3 are attached. The DAF Standards Set and the DAF Standards Summary Crosswalk Table are attached. The proposed BCR 2000-004, which identifies the seven orders to be added to the B2 and B3 Lists, is approved. The Volume 1-4 Crosswalk documentation is available through the DAF SIT.

WBS: **Standard Number:**

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BCR: 2000-004 List B2 and B3, Addition of DOE/NV Orders for Applicability by National Laboratories

Approval Date: 3/7/2000

Disapproved:

Description. This change will add the following seven DOE/NV directives to both the B2 List (Directives for work exempted from WSS process) and B3 List (Directives for DAF):

DOE/NV M 220.X CRD Oversight Management

DOE/NV O 230.X CRD Lessons Learned

DOE/NV M 410.X CRD Task Plan and Change Control Process

DOE/NV M 412.X, CRD Project Screening and Location Approval Process

DOE/NV M 412.X1, CRD Real Estate/Operations Permit Manual

DOE/NV M 450.XA, CRD Authorization and Activity Agreements for Facilities and Operations.

DOE/NV M 450.3X, CRD Work Smart Standards (WSS) Manual

These DOE/NV directives were previously approved by the CRG and included in the DOE/NV WSS Work Breakdown structure element number 1.8, Administrative Systems and Controls, as these Directives were initially developed and processed through the CRG. These Directives are proposed to be added to the B Lists for use by DOE/NV to obtain additional assurance of applicability of all the directives on the DOE/NV B Lists to the work activities of the national laboratories (LLNL, LANL, and SNL) in Nevada. The B Lists will be used by DOE/NV to request that other operations offices Change Control Boards use the DOE/NV B lists to determine additional laboratory contract Directive requirements for laboratory work conducted in Nevada, and add appropriate Nevada Directives requirements (the selected Directives from the DOE/NV B Lists which may be missing from the laboratory contracts) into the laboratory contract B List.

Recommended action by the CRG: It is recommended that the CRG approve adding the above listed seven DOE/NV orders to the B2 and B3 Lists. The B2 and B3 Lists may then be considered fully applicable to the three National Laboratories work in Nevada as determined by the DOE/NV CRG.

Justification: The DOE/NV Complex-wide WSS, as contrast from the B Lists of directives, were initially established on an activity basis for application to DOE/NV contractors (not laboratories), using the DOE and DOE/NV approved WSS processes as defined in DOE M 450.3-1 and as planned by DOE/NV. BN and WSI participated in the DOE/NV WSS process. The laboratories participate on the DOE/NV Change Review Group and assist in controlling changes to DOE/NV WSS and the B lists.

This definition of DOE and DOE/NV Directive requirements on the B2 and B3 Lists is an INTERIM SOLUTION

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and is expected to be replaced in the future by appropriate Format 1 s which address all the activities conducted by the laboratories in Nevada with respect to ES&H, emergency management, public affairs, etc. A DOE/NV Standards Identification Team will be established by the CRG to develop the appropriate Format 1 s to address all laboratory work activities conducted in Nevada.

The LONG TERM SOLUTION for definition of all laws, regulations, DOE Directives, and other documents will be addressed by a Standards Identification Team (Tri-Lab SIT) under the authority and direction of the DOE/NV CRG. The SIT may have representatives including the three laboratories, DOE/NV, DOE/AL, DOE/OAK, and the University of California. The Tri-Lab SIT will establish the Format 1 s sufficient to address the Tri-lab strawman WBS work activities and as a minimum will eliminate three existing categories of work currently exempted from DOE/NV WSS: Nuclear Device assembly/disassembly, Energetic Experiments with SNM, and Nuclear Explosive Safety. Actions associated with this path forward were established with the concurrence of the CRG Members in the 3/1/2000 CRG meeting.

Cost Impact: Cost impact on the work associated with this change is not at issue.

Schedule Impact: Schedule impact with the work associated with this change is not at issue.

WBS: R2	Standard Number: NV M 220.X, CRD
WBS: R2	Standard Number: NV M 412.X, CRD
WBS: R2	Standard Number: NV M 410.X, CRD
WBS: R2	Standard Number: NV M 450.XA, CRD
WBS: R2	Standard Number: /NV M 450.3X, CRD
WBS: R2	Standard Number: NV M 421.X1, CRD
WBS: R2	Standard Number: NV O 230.X, CRD

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WBS: R3	Standard Number: NV M 220.X, CRD
WBS: R3	Standard Number: NV M 410.X, CRD
WBS: R3	Standard Number: NV O 230.X, CRD
WBS: R3	Standard Number: NV M 412.X1, CRD
WBS: R3	Standard Number: NV M 412.X, CRD
WBS: R3	Standard Number: NV M 450.3X, CRD
WBS: R3	Standard Number: NV M 450.XA, CRD

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BCR: 2000-003 Directive Replacement Directive DOE O 551.1, Official Foreign Travel

Approval Date: 3/1/2000

Disapproved:

Description: This change request provides for adoption of DOE Order 0 551.1, Official Foreign Travel, Contractor Requirements Document, (CRD) as a DOE/NV Work Smart Standard (WSS) for WBS 1.2.3, Specialty Areas (Finance), regarding travel. DOE 1500.3 was canceled and replaced by DOE O 551.1; therefore, DOE 1500.3 should be deleted from WSS.

Recommended Action by the CRG: It is recommended that the following actions be taken regarding WBS 1.2.3, Format 1, Section 3:

- *Add DOE Order 0 551 .1, CRD, Official Foreign Travel*
- *Delete DOE 1500.3, Foreign Travel*

No change to the Format 1 description of work or management issues is considered necessary Justification: The old DOE Order has be replaced with a new three-digit order which includes a CRD. The requirements on contractors are segregated from requirements of DOE employees, involve processes for review and approvals and travel sensitivities which were not significantly changed by the new Directive.

Cost Impact: Not in contention.

Schedule Impact: Not in contention.

Impact on the Work if Change is not Made: If the change is8 not made DOE/NV will not have a current set of process requirements for contractors to effectively implement travel activities in a manner which is integrated with DOE requirements for DOE review and approval processes.

WBS: 1.2.3 Standard Number: DOE O 1500.3

WBS: 1.2.3 Standard Number: DOE O 551.1, CRD

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BCR: 2000-002 WBS 1.2.3 Specialty Areas (Finance), Work for Others (Non-DOE Funded Work)

Approval Date: 3/15/2000

Disapproved:

Description: This change request provides for a uniform DOE and DOE/NV process for the review, acceptance, authorization, administration, monitoring, and evaluation of Work for Others (WFO) funded work at DOE/NV. This process applies to reimbursable work as described in WBS 1.2.3, Specialty Areas (Finance). This WFO process as it applies to contractors and is as established in the following Orders: DOE O 481 .1, Contract Requirements Document (CRD); DOE/NV O 481.1, CRD, and DOE M 481 .1-1.

Recommended Action by the CRG: It is recommended that the following DOE and DOE/NV Directives be added to WBS 1.2.3:

- DOE Order O 481.1, WFO (Non-DOE Funded Work), CRD
- DOE Manual M 481.1-1, Reimbursable Work for Non-Federal Sponsors Process Manual
- DOE/NV Order O 481.1, WFO (Non-DOE Funded Work), CRD

No change to the Format 1 description of work or management issues is considered necessary.

Justification: The DOE Order and Manual have been tailored by the DOE/NV Order CRD, where appropriate, to apply to DOE/NV contractors as determined by DOE/NV management. These directives, taken collectively, provide the necessary financial management and review and approval process governing reimbursable work conducted under the purview of DOE/NV.

Cost Impact: Not in contention.

Schedule Impact: Not in contention.

Impact on the Work if Change is not Made: If the change is not made DOE/NV will not have a process to effectively comply with the DOE Directives governing reimbursable work for others.

WBS: 1.2.3 Standard Number: DOE M 481.1-1

WBS: 1.2.3 Standard Number: DOE O 481.1, CRD

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WBS: 1 2 3 **Standard Number:** NV O 481.1, CRD

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BCR: 2000-001 DOE/NV Work Smart Standards Manual, WBS 1.8 Administrative Systems and Controls

Approval Date: 12/22/1999

Disapproved:

A. *Description.* This change request is to propose that the DOE M 450.3X, DOE/NV Work Smart Standards Manual, Contract Requirements Document, be added to the DOE/NV complex-wide Work Smart Standards. This manual defines the Change Review Group (CRG) Charter and approved mechanisms used for conducting the work of the CRG, including qualification of personnel.

B. *Recommended Action by the CRG:* It is recommended that the CRG:

1. Adopt DOE/NV 450.3X, DOE/NV Work Smart Standards Manual, CRD, which establish the requirements and DOE/NV processes established for the conduct of the CRG.

2. Modify the Format 1, for WBS 1.8, by adding paragraphs to the three sections as follows:

- Section 1. Activity Descriptions shall include: "This activity includes contractor, national laboratory, and other federal agencies, and other user organizations requirements to participate consistent with DOE/NV Change Review Group processes establish to coordinate and control, by consensus, and the DOE/NV complex-wide Work Smart Standards."

- Section 2. Hazards and Management Issues shall include the following: "Appropriate DOE/NV mechanisms, process controls, and uniformity of documentation is necessary for DOE/NV to efficiently and effectively coordinate! and integrate complex wide work smart standards on a consensus basis with agreement parties. These processes must be integrated with existing DOE/NV contracts and agreements such that ES&H requirements mandated for use DOE/NV complex-wide, where applicable, are agreed upon consistent with contract provisions to assure all work activities are planned to be conducted safely."

- Section 3. Standards shall be modified by adding the following: "DOE/NV M 450.3X, DOE/NV Work Smart Standards Manual, CRD."

Note: Members of the CRG were appraised of the DOE/NV decision to expedite the DOE/NV Leadership Team review of the NV Y 450.3X in the CRG meeting of 12/1/99, and that they would be provided an opportunity for input on the Manual at a meeting held 12/21/99. This action was to ensure the CRG members were provided an opportunity to maintain their consensus agreement on the acceptability of the Directive, CRD, becoming a Work Smart Standard, and allow DOE/NV to expedite getting this directive issued for implementation as soon as possible as directed by the Chairman of the CRG.

C. *Justification.* DOE/NV has established a Change Review Group with representative of all major participating organizations to serve as the Convened Group charged with the responsibility to control the DOE/NV complex Wide WSS as contract/agreement mandatory requirements. These requirements are by reference in contracts and agreements binding on participating organizations as defined in their contracts and agreements with DOE/NV.

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DOE/NV, in order to effectively and efficiently maintain WSS and process changes with consensus agreements of the parties established management documentation on the CRG, and set up representatives from participating organizations with authority to accept or reject WSS for their organization on a consensus basis. The DOE/NV WSS Manual provides the documented Charter for the CRG, the processes by which the CRG's work is to be accomplished, and the contract requirements mandating the use of DOE/NV established processes in the Manual in the conduct of the work in support of the CRG.

D. Cost Impact: not at issue.

E. Schedule Impact: not at issue.

F. Impact on the work if change is not made. Management processes to be implemented by many organizations and people must be established and documented to assure uniform and consistent understanding, training of personnel, and implementation. Without documentation of the CRG Charter and processes, necessary and sufficient ES&H mandatory requirements and other administrative requirements could not be effectively maintained. Consensus agreement by responsible management of each organization on DOE/NV complex wide WSS could not be effectively maintained. Degradation of management's direct involvement and commitment established to help workers to do the work safely in accordance with mandatory requirements would occur. The level of safety could deteriorate, the level of safety performance of contractor could go down, and the number of potential and actual accidents, injuries, and property loss could increase if these processes are not established and used.

G. Attachments: DOE/NV M 450.3X, DOE/NV Work Smart Standards, dated 12/21/99.

WBS: 1 8

Standard Number: NV M 450.3X, CRD

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BCR: 1999-102 BN Contract Modification to Include 5820.2A Radioactive Waste Management**Approval Date:** 12/9/1999*Letter of direction from contracting officer to BN, dated Dec 9, 1999.***Disapproved:****WBS:** 2.1.6 **Standard Number:** DOE O 5820.2A**WBS:** 2.1.7 **Standard Number:** 10 CFR Subpart C, Section 61.40-61.44**WBS:** 2.1.7 **Standard Number:** DOE O 5820.2A**WBS:** 2.1.7 **Standard Number:** 10 CFR 71**WBS:** 2.1.7 **Standard Number:** 10 CFR 61.55, Subpart D**WBS:** 2.11 **Standard Number:** 10 CFR 61.55 and 56**WBS:** 2.11 **Standard Number:** DOE O 5820.2A**WBS:** 2.11 **Standard Number:** 10 CFR 71

BCR: 1999-101 Nuclear Explosive Safety and Weapons Surety Program**Approval Date:** 3/11/1999*Letter of Direction to BN. (No hard copy.)***Disapproved:****WBS:** B2 **Standard Number:** DOE O 5610.12

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BCR: 1999-021 WBS 1.8 Administrative Systems and Controls, Add NV M 220.X, CRD, DOE/NV Oversight Management System

Approval Date: 12/22/1999

Disapproved:

Description: This Change Request proposes that DOE/NV M 220.X, DOE/NV Oversight Management System, CRD, be adopted as DOE/NV Work Smart Standards. It should be noted that the CRD contains requirements for the DOE/NV Oversight Program on the DOE/NV contractors and user organizations, Chapter 11; and the Business Management Oversight Process on the Performance Based Management Contractor only, Chapter 111. Since the requirements are administrative in nature, these requirements should be added to WBS element 1.8 Administrative Systems and Controls.

Recommended Action by the CRG: If this BCR is accepted by the CRG the following changes are to be made: The Format 1 for WBS 1.8 Management Systems and Controls will be modified as follows:

- Section 1 Description. Add, "This work activity includes an oversight process of business management systems which are conducted jointly by M&O Contractors (currently only Bechtel Nevada, Inc.) and DOE/NV, consistent with Department policy. It also includes an ES&H oversight process conducted by DOE/NV on contractors and laboratories wherein such (organizations are expected to implement an internal self assessment program in accordance with Quality Assurance requirements".*
- Section 2, Hazards and Management Issues. Add: The planning and documentation of performance agreements; and joint evaluation of M&O contractor performance in the area of business management functions for the benefit of DOE senior management and Headquarters as a matter of policy are considered a management issue. In addition, the DOE/NV's ES&H Oversight responsibilities are to be integrated with contractor internal oversight activities as a matter of DOE Policy DOE P 450.5 are considered a management issue."*
- Section 2, Standards. Add to the list of standards: "DOE/NV M 220.X, DOE/NV Oversight Management System, CRD, as st standard adopted to mitigate the management issues.*

Justification: DOE/HQ as a matter of policy has established a uniform business management oversight process and a DOE line ES&H oversight management policy which must be tailored by the Operations Office for implementation, where appropriate, to apply to all M&O contractors and user organizations, and to the Performance Based Management Contractor, where appropriate. DOE/HQ, as a matter of policy, has established line ES&H oversight process wherein the DOE process is to rely to a significant degree on the QA processes implemented by a contractor or laboratory. This DOE/NV Directive 220.X, CRD is to establish DOE/NV processes and the requirements on contractors and laboratories to enable DOE/NV to accomplish their work.

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Cost Impact: Not at issue.

Schedule Impact: Not at issue.

Impact on the work if change is not made: DOE/NV would be viewed by Headquarters as not complying with department wide Policy and process for contractor management oversight and evaluation documentation and Line ES&H oversight.

Attachments. DOE/NV M M 220.X, DOE/NV Oversight Management System.

WBS: 1 8

Standard Number: NV M 220.X, CRD

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BCR: 1999-020 Additions and Deletions to Work Activity, and Hazards and Management Issues, and Standards

Approval Date:

WITHDRAWN.

Disapproved:

Description: The proposal is to update WBS 1.1.1 by adding and deleting in the following sections: Work Activities, Hazards and Management Issues, and Standards.

DOE Notice 350.5, Use of Facility Contractor Employees for Services to DOE in the Washington, D.C., Area Contractor Requirements Document, (Attachment 1) tasks Bechtel to prepare an annual inventory of all personnel supporting DOE in the Washington, D.C., area, during the previous fiscal year. This information is combined with other Field Offices by DOE/HQ and presented to Congress.

DOE has finalized the guidance document for implementation of 42 USC 727 (4h), National Defense Authorization Act for FY 1993. The Department seeks the assistance of its contractors in developing work force restructuring plans; however, BN has the responsibility for implementing the provisions of the work force restructuring plan subject to oversight by NV.

Justification: (2.0 Hazards and Management Issues): DOE Notice 350.5 requires the Contracting Officer to maintain and provide to DOE/HQ an annual inventory of all contractor personnel supporting DOE in the Washington, D.C., area during the previous fiscal year. The Notice also states in I.(2) "The appropriate contracts should be modified to include this requirement as soon as practicable, but no later than the next scheduled modification, or if a new contract is contemplated, when the new contract is award." Currently Bechtel is voluntarily providing a similar report. Potential negative impact exist if the report is not completed and submitted to the Contracting Officer. NV will be in noncompliance with a DOE/HQ Directive.

Section 3 16 1 of the Defense National Authorization Act for FY 1993 requires the Secretary of Energy to develop a plan for restructuring the work force for a defense nuclear facility when there is a determination that a change in the work force is necessary. The Planning Guidance for Contractor Work Force Restructuring is the DOE guidance on developing a workforce restructuring plan.

Cost Impact: None.

Schedule Impact: None.

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Impact if Change is not made: NV will be in noncompliance with a DOE/HQ Directive and Section 3161.

Attachments:

- a. WBS # 1.1.1*
- b. Contractor Requirements Document, Reduction in Contractor Employment,\.*
- c. Contractor Requirements Document, Use of Facility Contractor Employees for Services to DOE in the Washington, D.C.*
- d. Planning Guidance for Contractor Work Force Restructuring.*
- e. September 15, 1999, Memorandum from Stephen Mournighan; Subject: Data Base of Facility Contractors Employees Located in the Washington, D.C., Area Who are Providing Services to the Department*
- f. Revisions*

WBS: 1.1.1 **Standard Number:** DOE N 350.5, CRD

WBS: 1 1 1 **Standard Number:** DOE O 350.1, CRD

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BCR: 1999-019 DOE Order 350.1, Contractor Human Resources Program, Contractor Requirements Document - Employee Benefits

Approval Date:

WITHDRAWN.

Disapproved:

Description: The proposal is to include DOE O 350.1, Contractor Human Resources Program, Contractor Requirements Document, Employee Benefits (Attachment 1) into the Bechtel contract.

The Contractor Requirements Document tasks the contractor to submit annually the Report of Contractor Expenditures for Employee Supplementary Compensation to the NV Contracting Officer. The report is used to assist Departmental Elements in evaluating the reasonableness of contractor employee compensation, welfare benefits (statutory and non-statutory), and retirement programs.

Justification: (2.0 Hazards and Management Issues): The Order requires the NV Contracting Officer to provide a copy of the Reports of Contractor Expenditures for Employee Supplementary Compensation to the appropriate DOE/HQ Departmental Elements. Currently Bechtel is voluntarily providing the report. The potential for negative impact exist if the report is not completed and submitted to the Contracting Officer. NV will be in noncompliance with a DOE/HQ Directive.

Cost Impact: There will be no cost impact to the contract. The Contractor Requirements Document does not impose additional reporting requirements. Bechtel is currently providing the report voluntarily.

Schedule Impact: None

Impact if Change is not made: NV will be in noncompliance with a DOE/HQ Directive, if Bechtel does not provide the report.

Attachments:

- a. WBS # 1.1.4*
- b. Contractor Requirements Document, Attachment 1*
- c. Report of Contractor Expenditures for Supplementary Compensation*
- d. Proposed Revisions*

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WBS: 1 1 4 **Standard Number:** DOE O 350.1, CRD

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BCR: 1999-018 **DOE Order 350.1, Contractor Human Resources Management Program, Contractor Requirements Document - Labor Relations**

Approval Date:

WITHDRAWN.

Disapproved:

Description: The proposal is to include DOE O 350.1, Contractor Human Resources Program, Contractor Requirements Document, Labor Relation (Attachment 1) into the Bechtel contract.

The Contractor Requirements Document tasks the contractor to complete the Report of Settlement for submission to the NV Contracting Officer. The report is to be completed 30-60 days after the ratification of formal labor union negotiations. The report is summary of settlement costs.

Justification: (2.0 Hazards and Management Issues): The Order requires the NV Contracting Officer to provide a copy of the Reports of Settlement to the appropriate DOE/HQ Departmental Elements. Currently Bechtel is voluntarily providing the reports. The potential for negative impact exist if the Reports of Settlement are not completed and submitted to the Contracting Officer. NV will be in noncompliance with a DOE/HQ Directive.

Cost Impact: There will be no cost impact to the contract. The Contractor Requirements Document does not impose additional reporting requirements. Bechtel is voluntarily providing the reports.

Schedule Impact: None.

Impact if Change is not made: NV will be in noncompliance with a DOE/HQ Directive, if Bechtel does not provide the report.

19. Attachments:

- a. WBS # 1.1.7*
- b. Contractor Requirements Document, Attachment 1*
- c. Report of Settlement*
- d. Revisions*

WBS: 1.1.7 **Standard Number: DOE O 350.1, CRD**

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BCR: 1999-017 WBS 1.8, Administrative Systems and Controls, DOE/NV Directive System

Approval Date: 10/28/1999

Disapproved:

Description: This change request proposes that DOE Order 251.1 A, Contractor Requirements Document, DOE M 251.1A, and DOE/NV Manual 251.1A, Contractor Requirement Document be adopted as DOE/NV Work Smart Standards. Since the associated requirements are administrative in nature, these requirements are proposed to be added to WBS element for WBS 1.8, Administrative Systems and Controls.

The DOE Order 251.1 A, including CRD, and Manual M 252.1-1A provide the basis for contractors to understand the DOE Directives System. The Contractor Requirements Document Attachment to O 251 .1A specifies minimal requirement for contractor participation and the Manual NV 251 .1-1A provides the DOE/NV processes. The expected benefit of contractor and others participation is better DOE directives. Contractor participation also provides opportunity for interaction with DOE in the development phase of Directives, where Contractor Requirements (CRDs) attached to directives may be found more acceptable for incorporated into contracts, where appropriate PBMC contractors contracts contain DEAR Clause 970.5204-78 which specifies the need for the DOE/NV to provide an opportunity to such contractors to assess impacts of Department Directives prior to contract modification.

Currently, DOE Order 252.1, CRD is included as mandatory requirements on the List B2 of the Bechtel and WSI contracts. This change will delete the predecessor DOE O 251.1, CRD and add the O 251.1 A, CRD, and the DOE/NV Manual, M 251 .1-1A, CRD. It should be noted that the DOE and DOE/NV Manual are not contractor requirement documents. They defines the DOE processes, and to some extent provides information for contractors to understand their role in participating with the DOE in development of sound Directives.

Proposed action for the CRG: By acceptance of this proposed change request:

A) DOE O 251.1, CRD will be deleted from the BN and WSI contracts (List B2).

B) DOE O 251.1-1A, CRD and DOE/NV M 251.1-1A to be added to WSS WBS element 1.8.

C) The Format 1, for WBS element 1.8 will be revised as follows:

- Section 1, Activity Description shall include the following: This activity includes participation in the DOE and DOE/NV processes of development of sound DOE and DOE/NV Directives.*
- Section 2, Hazards and Management issues shall include the following: In order for DOE/NV and Contractors to integrate planning, appropriate contractor participation in DOE/NV processes can ensure overall economy and efficiency and improvement of quality of DOE/NV directives, especially contractor requirements documents.*
- Section 3, Standards list should include DOE O 251.1A, DOE M 251.1A, and DOE/NV M 251.1A. The*

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DOE/NV supplemental Directive System.

Justification: DOE and DOE/NV supplemental directives are the ultimate set of internal enduring documents used to communicate DOE and DOE/NV policy, requirements, and processes to federal employees, and includes Contractor Requirements Document, where appropriate. Such participation ensures teamwork and win win success. Participation by certain major contractor and Laboratory organizations in the development phase of the process can ensure more sound DOE documents are developed. Such participation without requirements to frame the DOE expectations is unwise. Contractors and Operations Office personnel will be provided opportunity to interact with others and DOE/NV as part of the Change Review Group for Work Smart Standards.

Cost Impact: Not in contention.

Schedule Impact: Not in contention.

Impact if Change is not made: Without this change, contractors would not be expected to help ensure Directives and DOE communications of expectations for ES&H and programmatic activities.

Attachments: Copy of draft NV M 25 1.1A is attached. Copies of approved DOE O 252.1A and DOE M 251.1A are available from the DOE/NV Home page.

WBS: 1 8	Standard Number: /NV M 251.1-1A
WBS: 1.8	Standard Number: DOE M 251.1-1A, CRD
WBS: 1 8	Standard Number: DOE O 251.1A, CRD
WBS: R2	Standard Number: NV M 251.1-1A
WBS: R2	Standard Number: DOE O 251.1A, CRD
WBS: R2	Standard Number: DOE M 251.1-1A, CRD

Baseline Change Request Log

BCR: 1999-016 DOE/NV O 56XH.1A, Subcritical Experiment Safety Program, CRD; Revised Directive to Update WSS List B2

Approval Date: 12/1/1999

Disapproved:

Approved with Conditions: "SCE" to be added before "Safety Critical Equipment" in 6j DEFINITIONS in the body of the Order.

Description: DOE/NV Order 56XH.1 A, Subcritical Experiment (SCE) Safety Program, including Contractor Requirements Document (CRD), is a final draft revised DOE/NV Directive which establishes DOE/NV safety requirements for implementation by Elements of DOE/NV, National Laboratories, and NV contractors. This revised DOE/NV Directive serves as an integral part of the safety management system for work assigned to DOE/NV participants (DOE/NV organizational elements, National Laboratories, Bechtel Nevada, Inc., and WSI) on subcritical experiments. Pending completion of CRG review/action, this revised directive will be submitted to the DOE/NV Manager for approval.

The revision to the Directive consists of minor clarifications and editorial changes to the basic directive and the CDR. In addition, a new Attachment 3 has been provided.

Recommended Action by the CRG: Upon approval of the revision to the Directive by the Manager, NV, it is recommended that the CRD be incorporated into the WSS as a part of List 82, DOE Directives Applicable to Activities not included in the Necessary and Sufficient Process.

Justification: There are no Laws, regulations, or DOE Directives, which address the specific safety requirements specified in the DOE/NV Order for Subcritical Experiments. The CRD to this DOE/NV Directive serves as the standard. It provides the requirements considered necessary and sufficient by DOE/NV management, assuming reasonable implementation by national laboratories and DOE/NV contractors, to mitigate potential adverse consequences to the worker, the public, and the environment associated with the conduct of subcritical experiments by responsible organizations.

Cost Impact: Not at issue.

Schedule Impact: Not at issue.

Impact on the work if change is not made: The DOE Directive that serves as the adopted standard for the work

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would not be maintained current. The benefit of the current revision to the Directive would not be obtained by responsible organization implementation.

Attachments: A copy of the Draft Directive which included resolution of all Leadership Team comments is provided dated "latest revision: 8/17/99.

WBS: R2

Standard Number: NV O 56XH.1A, CRD

Baseline Change Request Log

BCR: 1999-015 NV Manual 450.XA, Revision to Activity and Authorization Agreements for Facilities and Operations, WBS 1.8 Administrative Systems and Controls

Approval Date: 10/20/1999

Disapproved:

Description: DOE/NV M 450.XA, Authorization and Activity Agreements for Facilities and Operations, Contractor Requirements Document (CRD), has been changed and should replace the existing DOE/NV M 450.X, CRD currently included as WSS under WBS 1.8, Administrative Systems and Controls. (It should be noted that Change 1 to this directive was purely an editorial change to correct a clerical error in the basic Directive, and WBS 1.8 and had not yet been modified to include M 450.X, CRD or CHG 1, due to CRG coordinator administrative delays regarding notifications).

Most changes to the directive are minor editorial changes and corrections:

- to the basic Directive (editorial).
 - guidance information in Attachment 2, Authorization and Activity Agreement Format (provides latitude on the identification of phases and roles and responsibilities as further detailed in the guidance of Attachment 3).
 - Some minor changes resulted from the Leadership Team review process regarding emergency management which are contained in the manual and guidance Attachment 3.
- The change to the CRD caused the need for evaluation by the CRG:*
- Minor changes to the CRD, (A requirement previously located in Attachment 2 guidance was moved to Attachment 1 as a contractor requirement).

Recommended Action by the CRG: If this BCR is approved by the CRG then DOE/NV M 450.X, CRD, will be replaced by DOE/NV M 450.xl4, CRD, as the WSS in WBS 1.8 Administrative Systems and Controls.

Justification: This change was required to resolve EH-2 concerns about the adequacy of Activity Agreements as defined in an NV Corrective action Plan, 99-2-NV-7, to the EH-2 ISME conducted in March 1999. In addition, several minor editorial changes and corrections were included and most related to emergency management concerns of the Emergency Management Division of DOE/NV.

Cost Impact: Not an issues.

Schedule Impact: Not an issues.

Impact on the work if change is not made: The most current DOE/NV Directive will not be included in current

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WSS.

Attachments: WBS 1.8 Format 1 and Draft NV M 450.X, CHG 2, ready for final NV concurrence and Manager approval.

WBS: 1.8

Standard Number: NV M 450.XA, CRD

Baseline Change Request Log

BCR: 1999-014 WBS 1.8, Administrative Systems and Control, Lessons Learned Program

Approval Date: 10/28/1999

Disapproved:

Description: This change request proposes that DOE/NV Order 230.X, DOE/NV Lessons Learned Program, Contractor Requirements Document, be adopted as DOE/NV Work Smart Standards. Since the associated requirements are administrative in nature, these requirements should be added to WBS element 1.8 Administrative Systems and Controls.

This proposed NV Order defines DOE/NV's Processes that ensure lessons learned are adequately integrated into DOE/NV and DOE complex wide information systems such that benefits from past experience is incorporated into current and future planning and work processes. The process defines methods for use by the various contractors, laboratories, and other federal agencies. The process provides for cooperatively and efficiently processing local information through the leadership of the Performance Based Management Contractor and provides DOE/NV generated information into the DOE Complex wide system.

PROPOSED ACTION BY THE CRG: If this BCR is accepted by the CRG the following changes are to be made:

*a. The Format 1 for WBS 1.8 Management Systems and controls will be modified as follows: Section 1 Descriptions. Add: This work activity include a management system for communicating lessons learn to appropriate people within the DOE/NV community or organizations and DOE Department wide organizations consistent with Department policy.
Section 2, Hazards and Management Issues. Add: "The documentation and distribution of lessons learned for the benefit of others within the department is considered a management issue."
Section 3. Standards. Add: list DOE/NV Order 230.X, CRD, DOE/NV Lessons Learned Program, as a standard adopted to mitigate the management issue.*

Justification: DOE/HQ has supported improvement/.

DOE/NV's existing Lessons Learned program operated without a formal management policy or directive (there currently is no DOE Directive on Lessons Learned). DOE/NV identified in the Corrective Action Plan for the EH-2 Integrated Safety Management Evaluation Corrective Action 99-4-NV-5, Develop a Lessons Learned Program Directive.

Cost Impact: Not in contention.

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Schedule Impact: Not in contention.

Impact if Change is not made: DOE/NV and the contractor and laboratory organizations would not have an integrated and efficient method of providing Lessons Learned type information for the benefit of DOE complex wide.

Attachments: Draft DOE/NV Order 230.X, DOE/NV Lessons Learned Program.

WBS: 1.8

Standard Number: NV O 230.X, CRD

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BCR: 1999-013 Military Munitions, WBS 2.13, New Format 1

Approval Date: 10/20/1999

Disapproved:

Description: This is a new WSS Work Breakdown Structure element 2.13, Military Munitions, governing the on-site transportation, storage, use, and disposal of military munitions associated with activities conducted under the purview of the Department of Energy Nevada Operations Office (DOE/NV). This includes research and development (R&D) activities using explosives conducted primarily at the Nevada Test Site.

Justification: The existing Work Smart Standards clearly delineate that they are for the transportation, storage, use, and disposal of commercially available explosives. At the time the WSS were derived, the presence of Department of Defense (DoD) munitions was a low enough occurrence that the DOE/NV WSS documentation called for them to be dealt with on a project specific basis through the use of DoD standards. The work at the NTS using military munitions has picked up and the WSS set standard now need to be re-evaluated and the proposed Format 1 reflect this new type of work activity.

Cost Impact: Potential cost impacts associated with implementation are not an issue.

Schedule Impact: Potential schedule impacts associated with implementation are not an issue.

Impact if Change is not made: Ongoing work activities and R&D would not benefit from consistent application of a universal set of standards needed by DOE/NV to assure adequate hazard and issue mitigation associated with transportation, storage, use, and disposal of military munitions.

Attachments: Format-I WBS 2.1 3, Military Munitions, Independent Review Validation.

WBS: 2.13 Standard Number: 40 CFR, Part 266, Subpart M

WBS: 2.13 Standard Number: DOD 5100.76-M - Chapter 2.A

WBS: 2.13 Standard Number: DOE M 440.1-1 - Chapter 2, Section 13

WBS: 2.13 Standard Number: DOD 5100.76-M, Chapter 5

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WBS: 2.13	Standard Number: DOD 6055.9-STD, Chapters 1-9, 12 and Appendix A
WBS: 2.13	Standard Number: AFMAN 91-201 - Chapter 2, Sections A-E, and G
WBS: 2.13	Standard Number: Nevada Test Site Standard Operating Procedure 5412, Paragraph 5.b
WBS: 2.13	Standard Number: TM-60A-1-1-31

Baseline Change Request Log

BCR: 1999-012 Extract the Medical Program Management (MPM) Activities From the 4.0 Medical Programs WSS WBS, Revise the MPM Work Activity Description and Specify the Applicable Standards

Approval Date: 10/20/1999

Disapproved:

Description: This Work Activity was previously part of 4.3, Medical Programs. It is being broken out as a stand alone Work Activity to clearly address the specific work activity and its hazards, management issues and N&S standards which are separate and generally distinct from the other activities described in 4.3, i.e., Occupational Medical Services and Emergency Medical Services.

Justification: These changes will clearly delineate to all users of DOE/NV facilities the requirements for integrated Medical Program Administration, regardless of the service provider. Change to this WBS was initiated by DOE/NV, through BCR CR-1, after the DOE/HQ EH-2 review of the Occupational Medicine program in 1998.

Cost Impact: The cost impact is minimal.

Schedule Impact: None.

Impact if Change is not made: The description of the EMS Work Activity and applicable standards listed in the 4.3, Medical Programs, Format-1 will be inaccurate. Full integration of the Medical Program may not be achieved to customer satisfaction.

Attachments: New Format-1.

- WBS: 4.3.1 Standard Number:** 10 CFR 1046
- WBS: 4.3.1 Standard Number:** 10 CFR 711, Subpart A
- WBS: 4.3.1 Standard Number:** National Fire Protection Association (NFPA) 1582
- WBS: 4.3.1 Standard Number:** DOE O 440.1A
- WBS: 4.3.1 Standard Number:** NRS 450.b.

Baseline Change Request Log

BCR: 1999-011 Extract the Emergency Medical Services Activities From the 4.3 Medical Programs WSS WBS, Revise the EMS Work Activity Description and Add New Standards

Approval Date: 10/20/1999

Disapproved:

Description: This Work Activity was previously part of 4.3, Medical Programs. It is being broken out as a stand alone work Activity because the hazards and management issues and N&S standards are generally unique to the Emergency Medical Services (EMS) as provided by paramedics assigned to a Fire Department. Emergency Medical Services aligned with a Fire Department, which includes Hazardous Material Response responsibilities, are subject to an increased set of N&S standards. These additional responsibilities and standards are being included in the Work Activity description baseline standards set (see attached Format-1).

Justification: Changes in the 4.3, Medical Programs WBS, and the alignment of the EMS Work Activity with the NTS Fire Department, resulted in the activity being subject to additional standards and expansion of the Work Activity description to include Hazardous Material Response support. These standards differ from typical EMS not affiliated with fire departments. Applicable National Fire Protection Association (NFPA) and OSHA Hazardous Material Emergency Response standards now apply to paramedics assigned to the NTS Fire Department.

Cost Impact: The cost impact is minimal.

Schedule Impact: None.

Impact if Change is not made: The description of the E:MS Work Activity and applicable standards listed in the 4.3, Medical Programs, Format-I will be inaccurate.

Attachments: New Format-I

The Emergency Medical Services work activity was previously part of the 4.3, Medical Programs, WSS work activity. In the process of addressing an EH-2 finding regarding 4.3, Medical Programs, which was concurrent with a realignment of the EMS function with the NTS Fire Department, the Medical Programs SIT recommended the breakout of both the Medical Administration and the EMS work activities from 4.3, leaving the Medical Services work activity. The primary basis for separating EMS as a stand alone Work Activity is that the hazards and management issues and N&S standards applicable to EMS as provided by paramedics assigned to a Fire Department with Hazardous Material Response responsibilities, are generally unique and different from the

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clinical medical services and medical administration. Additionally, aligning with the Fire Department resulted in the EMS activity being subject to additional standards and a change in work activity description. Both change in activity description and inclusion of the additional standards is reflected in the attached Format-1 s.

WBS: 4 1 3	Standard Number: National Fire Protection Association (NFPA) 473
WBS: 4 1 3	Standard Number: National Fire Protection Association (NFPA) 1581
WBS: 4.1.3	Standard Number: 29 CFR 1910.120
WBS: 4.1.3	Standard Number: 29 CFR 1910.134
WBS: 4.1.3	Standard Number: 29 CFR 1926.65
WBS: 4.1.3	Standard Number: National Fire Protection Association (NFPA) 471
WBS: 4.1.3	Standard Number: National Fire Protection Association (NFPA) 472
WBS: 4.1.3	Standard Number: KKK-A-1822
WBS: 4.1.3	Standard Number: National Fire Protection Association (NFPA) 1999
WBS: 4.1.3	Standard Number: 29 CFR 1910.1030
WBS: 4 1 3	Standard Number: NRS 450B.015 - 450B.936
WBS: 4.1.3	Standard Number: 29 CFR 1910.132

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BCR: 1999-010 Breakout from the existing 4.3, Format-1, Medical Program Management and Emergency Medical Services Activities

Approval Date: 10/20/1999

Disapproved:

Address the remaining work activity, Occupation Medical Services, and update applicable standards.

Description: The proposed changes to this document are in the areas of program oversight, programmatic elements, and management interface. The Occupational Medicine program has changed significantly since the original WSS work was completed. Emergency Medical Services (EMS) has been moved to a different management tree, and operation of required medical programs now needs to meet standards and components not currently included in the approved WSS. These latter changes were suggested by the DOE/NV. The EMS activities will be separated from this WBS to stand alone (WBS 4.1.3) as will the Medical Program Administration (WBS 4.3.1). The remaining work activity will be Occupational Medical Services (WBS 4.3.2), see attached redline format-1. These three WBSs will replace WBS 4.3, Medical Programs.

Justification: These changes will clearly delineate to all users of DOE/NV facilities what their requirements are in terms of medical, regardless of the service provider. The current 4.3, format-1 does not provide for such an operations method. Change to this WBS was initiated by DOE/NV, through BCR CR-1, after the DOE/HQ EH-2 review of the Occupational Medicine program in 1998.

Cost Impact: The cost impact is minimal. The change will require labor hours in the form of oversight activities.

Schedule Impact: None.

Impact if Change is not made: Continued disconnects, between DOE/NV expectation and program execution, and an inaccurate description of the Medical Services WSS Work Activity and listing of the applicable standards.

Attachments: Redline and New Format-1.

WBS: 4.3.2 Standard Number: 29 CFR 1910.1001 and 29 CFR 1926.1101

WBS: 4.3.2 Standard Number: DOE O 440.1A

WBS: 4.3.2 Standard Number: American National Standards Institute (ANSI) Z136.1

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WBS: 4.3.2	Standard Number: 29 CFR 1910.48 and 29 CFR 1926.1148
WBS: 4.3.2	Standard Number: 10 CFR 711, Subpart B
WBS: 4.3.2	Standard Number: 29 CFR 1910.1025 and 29 CFR 1926.62
WBS: 4.3.2	Standard Number: 29 CFR 1910.120 and 29 CFR 1926.65
WBS: 4.3.2	Standard Number: 29 CFR 1910.1020 and 29 CFR 1926.33
WBS: 4.3.2	Standard Number: 29 CFR 1910.95 and 29 1926.52
WBS: 4.3.2	Standard Number: 29 CFR 1910.134 and 29 CFR 1926.103
WBS: 4.3.2	Standard Number: 29 CFR 1920.1030
WBS: 4.3.2	Standard Number: 29 CFR 1910.132
WBS: 4.3.2	Standard Number: National Fire Protection Association (NFPA) Standard 1582

Baseline Change Request Log

BCR: 1999-009 Revise Work Activity Description and Adopt Additional Standards to Correct Current Programmatic Gaps

Approval Date: 10/20/1999

Disapproved:

Description: The proposed changes to the Fire Protection: Fire Prevention Format-1 are to address the issues related to the administrative and technical management identified in the BN Self-Assessment of the Fire Protection Program Report by revising the work activity description to include programmatic administration, clarify elements of the Fire Prevention Program, and the addition of those standards that provide the framework for implementing these changes.

Justification: The current Fire Protection Program lacked: the driver for and existence of a Fire Prevention policy; the requirements for specific reviews by qualified fire protection engineer(s); the requirements and specifications for performance of Fire Hazards Analysis; the framework for a documented fire protection self-assessment program; and process for reviewing and recommending and approval of fire safety "equivalencies" and "exemptions."

Cost Impact: Minimal.

Schedule Impact: None.

Impact if Change is not made: Technical objectives of a comprehensive Fire Protection Program would not be met. Basis of conclusion is the BN Self-Assessment of the Fire Protection Program Report.

*Attachments: Original Format-1, redlined Format-1, and revised Format-1.
Work Smart Standards Baseline Change Request - Additional Data*

Based on the results of a BN Fire Protection programmatic self-assessment and standards review a number of programmatic administration and technical implementation gaps were identified. To remedy these gaps the adoption of additional standards is required to provide the necessary framework for effective correction. To address these c o d a s the WBS Work Activity description is being revised to include programmatic administration, clarify elements of the Fire Protection Program, and adopt the standards that provide the framework for implementing these changes. Sees attached redline Format-1 . [Underline has been used for added text; highlight has been used for deleted text.]

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DOE O 420.1, Facility Safety , Contractor Requirements Document, was reviewed for purposes of selecting the applicable sections which provide the framework for the needed corrections.

The following sections provide the needed framework and mitigating measures-

4.2.1 General Programmatic Requirements, paragraphs:

1 (with excepted language), 4 (with excepted language), 5 (as qualified), 7, 9 (as qualified), 11.

Explanatory notes were added below each of the references to clarify application of the standards.

The sections not adopted were determined to be adequately addresses or implemented through the standards in the existing WSS 4.1.2 Work Activity or standards included in other existing WSS Work Activities.

WBS: 4. 1.2

Standard Number: DOE O 420.1, CRD

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BCR: 1999-008 Real Estate/Operations Permit, WBS 1.8 Administrative System and Controls (Note: Named changed from Work Authorizaiton Process)

Approval Date: 1/11/1999

Disapproved:

A. Description: This Addendum to the BCR 99-008 is to reflect the fact that after CRG approval of BCR 99-006, Asset Management, WBS 1.3.6, Facility Use Permits and BCR 99-008 DOE/NV Work Authorization Process; DOE/NV management decided to combine the two DOE/NV draft directives associated with these change requests in to one process addressed by one Directive: DOE/NV M 412.X1, Real Estate/Operations Permit. The Chairman of the CRG also directed the expediting of finalization of the draft directive for approval and implementation.

The consolidation of the two draft directives was accomplished by changing the name and content of DOE/NV M 412.X1 from DOE/NV Work Authorization Process to Real Estate/Operations Permit and abandoning the DOE/NV draft Directive 0 430.x Facility Use Permits. The DOE/NV 412.X1, Real Estate/Operations Permit, combined the concepts and needs of work authorization, operations permits, and facility use permits in one process. The process culminates in the requirement for one DOE/NV Real Estate/Operations Permit for each facility/operation and meets all the functional needs of DOE/NV related management issues.

B. Recommended Action by the CRG: It is recommended that the CRG

- Cancel BCR 99-006, regarding the Facility Use Permit Directive..*
- Accept this Addendum to the approved BCR 99-008, regarding the combining of DOE/NV directives as discussed above.*
- Adopt DOE/NV M 412.X1, Real Estate/Operations Permit, CRD, as a standard for WBS 1.8 Administrative Systems and Controls for the BN and WSI contracts.*
- Modify the Format 1, for WBS element 1.8 by adding paragraphs to the three section as follows:*
Section 1. Activity Description shall include the following: "This activity includes contractor, national laboratories, and other federal agencies, and other user organizations participation in DOE/NV planning processes, including those established for work authorization, control of real estate, and DOE/NV planning, deconflicting, anti scheduling operations at NTS."
Section 2. I-Hazards and Management Issues shall include the following: "Appropriate DOE/NV Management planning mechanisms must integrate contractor/user planning of new work and changes to existing work to ensure appropriate DOE/NV involvement at certain points in time and to ensure information is available so DOE responsibilities can be fulfilled. This planning involvement includes DOE safety reviews prior to DOE authorization to proceed with work (or significant changes to existing work), reviews associated with the control and protection of real estate, DOE assignment of responsibility for safety coordination, identification of hazards

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and controls associated with the use of DOE real estate (facilities and land), identification of hazardous materials inventories associated with real estate to facilitate emergency response actions, access to information necessary to facilitate DOE/NV S responsibility for deconfliction of plans and schedules of certain work at NTS, and provide an interface mechanism to facilitate accounting and recovery of proportionate infrastructure support costs from users of DOE real estate”.

Section 3. Standards shall include the following: “DOE/NV M 412.X1, Real Estate/Operations Permit, Contractor Requirements Document, dated December 15, 1999.”

Note: Members of the CRG were appraised of the DOE/NV decision to combine these DOE/NV draft directives in the 12/1/99 CRG meeting, that minor changes were anticipated as a result of the consolidation, that they would be provided drafts of the new directive, and would be provided an opportunity for input at a meeting held 12/14/99. This action was to ensure the CRG members were provided an opportunity to maintain their consensus agreement on the Directive, CRD, becoming a Work Smart Standard, and allow DOE/NV to expedite getting this directive issued for implementation as soon as possible as directed by the Chairman of the CRG.

C. Justification: See original BCR 99-008, except as noted above regarding Format 1 modifications..

D. Cost Impact: See original BCR 99-008.

E. Schedule Impact: See original BCR 99-008.

F. Impact on the work if change is not made: See original BCR 99-008.

G. Attachments: DOE/NV M 412.X1, Real Estate/Operations Permit, dated 12/15/99.

WBS: 1 8

Standard Number: NV M 412.X1, CRD

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BCR: 1999-008 DOE/NV Work Authorization Process, WBS 1.8 Administrative Systems and Controls

Approval Date: 8/12/1999

Disapproved:

Description: This change request proposes that DOE/NV Manual M 412.X1, DOE/NV Work Authorization Process, Contractor Requirement Document, be adopted as DOE/NV Work Smart Standards. Since the associated requirements are administrative in nature, these requirements should be added to WBS element for WBS 1.8, Administrative Systems and Controls.

This proposed Manual defines DOE/NV processes that ensures new work which may first be initiated by contractors, national laboratories, other federal agencies, and other users will be adequately integrated into DOE/NV planning process at the earliest appropriate time in the organizations planning process. The work of concern consists of both planning for new work and changes to existing work. The DOE/NV process provides defined risk threshold criteria to assist organizations' personnel in determining the work which DOE/NV participation is mandatory in the planning process.

Justification: This new capability DOE/NV process satisfies the intent discussed in the description above to get DOE/NV involvement in contractor and other organizations work planning. It also satisfies corrective action # 99-1-NV-1 (and other related corrective actions) that was developed in response to the EH-2 Integrated Safety Management Evaluation of the Nevada Test Site, April 1999. DOE'S approach to Integrated Safety Management includes appropriate involvement of the Operations Office planning mechanisms that interfaced with contractor planning processes. Hence, hazard identification and identification of controls/standards will necessarily have to be determined and reviews established to ensure appropriate DOE/NV personnel involvement.

Proposed action by the CRG: By acceptance of this proposed change request:

A) DOE/NV M 412.X1, CRD will be added to WBS activity 1.8, Administrative Systems and Control, on the BN and WSI contacts.

B) The Format I, for WBS element 1.8 will be revised by adding paragraphs to three Sections as follows:

1. Section 1, Activity Description shall include the following: "This activity includes contractor, national laboratories, other federal agencies, and other user organizations' participation in DOE/NV planning processes, including those established for DOE Work Authorization development as described in the DOE/NV planning documents (Directives System)."

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2. Section 2, Hazards and Management issues shall include the following: *Appropriate DOE/NV Management involvement in contractor/user planning of new work and changes to existing work must be accomplished at the appropriate point in time to ensure efficient and cost effective DOE planning."*

3. Section 3, Standards DOE/NV M 412.X1, DOE/NV Work Authorization Process, provide information need by organizations to economically and efficiently interface with DOE/NV's planning process established for new work and changes to existing work."

Cost Impact: Not in contention.

Schedule Impact: Not in contention.

Impact if Change not made: Current Task Planning and Change Control and Work For Others processes do not provide an effective mechanism to ensure that adequate DOE/NV expertise is consistently involved in reviewing the proposed mitigation of higher level risks that are of a concern to DOE/NV. This newly developed process has been tailored to resolve such inadequacies. Rejection of this proposed change will perpetuate the current potential for projects to proceed too far forward in planning without proper involvement on high-risk work by the Operations Office.

WBS: 1 8

Standard Number: NV M 412.X1, CRD

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BCR: 1999-007 Asset Management, WBS 1.3.6

Approval Date: 7/15/1999

Disapproved:

Description: DOE Order 430.1 , Life Cycle Asset Management (LCAM), is the DOE directive which establishes DOE'S unique performance requirements regarding the management of the Departments physical assets from acquisition through operations and disposition, including project management, real estate, maintenance, cost estimating, and utilities. The Order was initially adopted as a part of the DOE/NV WSS for WBS 1.3.6, Asset Management, and was recently updated by an "A" revision. The A revision includes a CRD which specifies contractor requirements and needs to be incorporated into DOE/NV WSS.

Justification: The O 430.1 was intended by the DOE to facilitate the replacement and cancellation of 14 predecessor DOE Orders related to asset acquisition and management. The O 430.1 was initially cited as a DOE/NV Work Smart Standard along with other regulations for WBS 1.3.6, Asset Management activities; however, at the time the Order did not include a Contractor Requirements Document (CRD). DOE and contractor requirements were commingled. Due to the sheer magnitude of requirements in some of the 14 predecessor Orders and commingling of requirements in O 430.1 , DOE/NV management (EAMD) was reluctant to remove some of the predecessor orders from the existing BN contract. The predecessor orders served as the basis of requirements for management processes BN had adopted from predecessor contractors. BN had not yet completed the transition to a BN integrated management system, which was to be developed to DOE/NV WSS. Many management system processes of predecessor contractors were "Blue Sheeted" or adopted by BN on an interim basis until formal BN procedures could be established in a BN integrated management system. This DOE/NV concern was mitigated by adding the List B4 that retained most of the predecessor Orders in the contract.

Recently DOE issued a revision to DOE O 430.1A1 dated October 10, 1998, which includes a Contractor Requirements Document as Attachment 2. The CRD provides the unique DOE definition of contractor performance requirements, including a requirement to apply DOE-STD-1120-98, as appropriate. The existence of the CRD resolves the above-discussed management concern, which was held by DOE/NV management regarding the adequacy or sufficiency of contractor performance requirements.

Proposed action for the CRG: 1) The CRG recommend that DOE O 430.1 be replace by DOE O 430.1A CRD and DOE STD-1120-98, INTEGRATION OF ENVIRONMENT, SAFETY AND HEALTH INTO FACILITY DISPOSITION ACTIVITIES, as cited DOE/NV Work Smart Standards for WBS 1.3.6 Asset Management. The Revision A and the Technical Standard would be included by modification into the BN and WSI contracts.

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- 2) *The CRG recommend that list B4 be deleted in its entirety from the BN and WSI contract by modification.*
- 3) *Delete reference to the Asset Management Plan as a1 cited standard for WBS 1.3.6, in Section 3, Standards. The plan is an implementing document which is periodically revised and approved by DOE/NV. The plan is to reflect the asset management programs established for both BN and WSI.*
- 4) *Bechtel Nevada contract, Section J, Appendix I, entitled Lists of Applicable laws, regulations, and DOE Directives, be modified by deletion of the last sentence which reads as follows: "And List B4) identifies ""DOE Directives applicable to Life Cycle Asset Management until Implementation Plan Developed"" and addresses the applicability of orders canceled by the DOE Order 430.1.""*
- 5) *WSI contract, Section J, Attachment D, entitled Laws, Regulations, and DOE Directives, be modified by deletion of the last paragraph which reads as follows: "List B4, identifies DOE Directives applicable to Life Cycle Asset Management until Implementation Plan Developed. List B4 identifies those DOE Directives that are applicable to any maintenance work that will be performed under Contact No. DE-AC08-98NW 3149."*

Note: This BCR regarding predecessor orders to the LCAM Order has no effect on orders listed on List B3 for the Device Assembly Facility.

In summary, the DOE 0 430.1A CRD along with the other regulations and standards in the set for WBS 1.3.6 are considered by EAMD as necessary and sufficient to govern the Asset Management program within the DOE/NV complex.

Cost Impact: Not an issue.

Schedule Impact: Not an issue.

Impact if Change is not made: The current DOE Order 430.1A canceled 0 430.1 which is presently cited in DOE/NV WSS. If this change is not made, DOE/NV WSS could be considered not current because it cites a canceled Directive. Work should be conducted to a DOE Directive that is maintained as current department policy. Such confusion could impact safety or economy of operations by BN and/or WSI in fact versus mandatory requirements of their contracts.

Attachments: DOE 0 430.1A, Life Cycle Asset Management, dated 10-14-98. However. It is not attached to save paper, but is readily available on Intranet and NV's home page through the Directives Management Center.

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WBS: 1 3 6 **Standard Number:** DOE O 430.1A, CRD

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BCR: 1999-006 Asset Management, WBS 1.3.6 Facility Use Permits

Approval Date: 7/15/1999

Disapproved:

Abandoned DOE/NV O 430.X. Cancelled 1/11/2000. See addendum to 1999-008.

Description: DOE/NV O 430.X, Real Property and Facility Management, established unique requirements for the control of DOE/NV real property and facilities by use of DOE/NV Facility Use Permit (FUP). The Contractor Requirements Document, attached to the Directive, provides requirements for a DOE/NV FUP system applicable to all contractors, national laboratories, other federal agencies, and other user/contractors and applies to all real property and facility assets. Requirements on the PBMC are included for implementation of administrative controls governing the DOE/NV FUPs. A FUP will serve as the agreement (commitment) document whereby user of real property or facilities commit to DOE/NV to comply with ES&H and emergency management requirements as defined in DOE/NV Work Smart Standards, as a minimum. The FUP also commits the user to conduct additional facility-specific planning (including hazard analysis) to ensure necessary and sufficient requirements are established and implemented for unique facility-specific work. The FUP also establishes requirements for users to abide by process controls on the safe, efficient, and effective utilization of DOE/NV property and facilities assigned to and implemented by the DOE/NV Performance-Based Management Contractor (PBMC) on behalf of the DOE/NV Engineering and Asset Management Division.

PROPOSED ACTION FOR CRG: 1) The CRG recommend that DOE/NV 430.X be added DOE/NV Work Smart Standards, WBS 1.3.6, Asset Management, 2) The CRG recommend that this change to WSS be incorporated into the Bechtel Contract, Section J, Appendix I, and the WSI Contract Section J Appendix D by reference, i.e., reference List A and B1.

Justification: With the implementation of performance based requirements defined in DOE O 430.1, Life Cycle Asset Management, local processes for assignment and control of DOE/NV real property and facilities was required. The initial process for management and control of DOE/NV assets was assigned to the DOE/NV PBMC. The PBMC devised a system for assignment and control including disposition of maintenance requests. However, during the March 1999, EH-2 Integrated Safety Management Evaluation, safety issues were raised. Issue 99-2 in part stated: Safety management roles and responsibilities associated with complex organizational interfaces at NTS are not always clear. For a facilities without Activity Agreements, there is no definition of roles and responsibilities or established expectations for non-BN facility owners.

The DOE/NV manual CRD provides performance based requirements which will accomplish the following: a)

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Establish a DOE/NV permit system for assignment of DOE/NV real property to users for specific-purposes to be administered for DOE/NV by the PBMC. The process will provide for establishment of an agreement (signed Permit) which commits the user, as a condition of occupancy, to ensure the worker the public and the environment will be protected from adverse consequences.

b) Address the ES&H responsibilities of all users of DOE real property (any defined land area used for a specific purpose) and facilities signing DOE/NV FUPs. This will include the requirement to implement ES&H and emergency management standards as defined for the work activities addressed in DOE/NV Work Smart Standards and a requirement to conduct facility-specific planning (including hazard analysis) for facility-specific work activities not addressed by DOE/NV WSS. Facility-specific requirements and hazards controls are to be established, with reviews and assistance provided by DOE/NV line management (SOD/NV). These are the same standards as imposed on the DOE/NV PBMC and include the provision for users to address safety on any unique work activities that they may conduct.

c) Clarifies that the FUPs system is a DOE/NV system and that the DOE/NV PBMC has been assigned the requirement to establish and implement administrative controls governing the issuance and control of DOE/NV FUPs. The system also provides the requirement for the PBMC to respond to request for maintenance from organizations accepting PBMC issued DOE/NV FUPs, and DOE/NV oversight functions to ensure corrective actions and safety issues are resolved.

In addition, the NV Directive defines DOE/NV line management oversight and interface coordination responsibilities for hazard analysis and reviews, and user support and assistance.

Cost Impact: Not an issue.

Schedule Impact: Not an issue.

Impact if Change is not made: A DOE/NV mechanism will not be available for real property or facility users to make a commitment to DOE/NV, as a condition of occupancy, to ensure that ES&H requirements are defined and implemented to protect workers, the public, and the environment from adverse consequences.

Attachments: A draft DOE/NV Order 430.X with Contract Requirements Document attachment is attached. The Draft Directive is in process at the DMC for approval.

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WBS: 1 3 6 **Standard Number:** NV O 430.X, CRD

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BCR: 1999-005 Request that DOE Order 440.1A, WORKER PROTECTION MANAGEMENT FOR DOE FEDERAL AND CONTRACTOR EMPLOYEES, be included in Bechtel Nevada Work Smart Standards

Approval Date:

Disapproved:

Canceled and Replaced by BCRs 1999-010, 1999-011, and 1999-012.

Description: WORKER PROTECTION MANAGEMENT FOR DOE FEDERAL AND CONTRACTOR EMPLOYEES, DOE Order 440.1A. This new series DOE Order replaced DOE Order 5480.8A CONTRACTOR OCCUPATIONAL MEDICAL PROGRAM. DOE Order 5480.8A was in the original contract with Bechtel Nevada when the contract was issued. Subsequently DOE Order 440.1 WORKER PROTECTION MANAGEMENT FOR DOE FEDERAL AND CONTRACTOR EMPLOYEES was issued September 30, 1995, which canceled the previous DOE Order 5480.8A shortly before Bechtel Nevada took over the contract. DOE Order 440.1 A was subsequently reissued on October 25, 1995. When the Work Smart Standards were developed, DOE Order 5480.8A was included, not DOE Order 440.1A.

DOE Order 440.1A establishes the management frame work for an effective worker protection program for Bechtel Nevada. DOE Order 440.1A gives management guidance to implement the necessary communication between the line management and qualified worker protection staff to reduce the likelihood of serious physical harm from hazardous operations. DOE Order 440.1A assigns worker protection responsibilities and hold personnel accountable for worker protection performance. DOE Order 440.1A encourages the involvement of employees in the development of program goals, and the identification and control of hazards, without reprisal. DOE Order 440.1A allows workers to accompany worker protection personnel during workplace inspections, participate in activities to remedy work place hazards and allow workers to express concerns related to worker protection.

Justification: The Office of Oversight Environment, Safety and Health (EH-2) completed a review of the DOE/NV Occupational Medicine Program as administered by Bechtel Nevada (BN). A root cause for a less than adequate Occupational Medicine Program was attributed to the Work Smart standards for BN which do not adequately define requirements for a fully integrated occupational medicine program. The inadequacy was attributed to a lack of DOE Order 440.1 A WORKER PROTECTION MANAGEMENT FOR DOE FEDERAL AND CONTRACTOR EMPLOYEES, not being included in the Work Smart Standards. (See Glen S. Podonsky, EH-2 letter to Gerald W. Johnson, Manager dated December 17 1998, Attachment 1.)

The inclusion of DOE Order 440.1A in the Work Smart standards will mandated a management framework to

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establish communication between the members of the worker protection team. DOE Order 440.1A specifically designates that the occupational medicine department as well as other worker protection personnel will be a part of the worker protection team to ensure the integration of safety to mediate and control work hazards. This requirement is not found in the specifically Work Smart standards as currently established.

The Bechtel Nevada Occupational Medicine Program provides Occupational Medical services for all DOE/NV Prime Contractors, and Federal Employees, These Prime Contractors such as WSI, IT and YMP/TRW are all contractually obligated to follow DOE Order 440.1A. This places the BN Occupational Medicine Program at conflict with prime contractors, because it is not required by contract to follow the same DOE Order 440.1A.

It is acknowledged that most of the worker protection standards that DOE Order 440.1 incorporates are found in other federal, state and local rules, which are already incorporated in the Work Smart standards. The important function that DOE Order 440.1A brings to the Work Smart standard is a clear defining of roles and responsibilities of worker protection team members as required by DOE Policy 450.4, Safety Management System Policy issued by The Secretary of Energy on October 15, 1996. This policy is also known as the Integrated Safety Management System (ISMS). This is the current standard by which the Nevada Operations Office will be judged in the pending EH-2 appraisal. While it is recognized that implementation of DOE Order 440.1A into the Work Smart standards will take time for the contractor to fully accomplish, it provides evidence that DOE/NV is responsive in correcting previously identified weakness in ISMS. Under the rules of assessments, the EH-2 team can note that DOE/NV is lacking in having a fully developed ISMS, but cannot demand corrective action if DOE/NV is working to correct previously identified weakness. By DOE/NV adopting DOE 440.1 A, which is the heart of ISMS, into the Work Smart standards it allows time for DOE/NV to more fully implement 'ISMS.

Cost Impact: In consulting with the contractor worker protection team managers, it is clear that the cost impact would be minimal. A majority of the requirements of DOE Order 440.1A are found in other federal, state and local rules and are being complied with. The new Work Smart standard of DOE Order 440.1 A, if adopted, mandates; two major requirements: A. Communication between worker protection team members to facilitate worker protection. B. Mandates the exchange of information between the worker protection team and operations line managers.

This implementation of a major component of ISMS requires the redirection of existing workforce personnel to come together in an organized effort to: A. Communicates potential hazards. B. Communicate Job Task

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Analysis and Hazard Analysis. C. Provide a quality feed back forum for continuous improvement of operations. D. Allows the communication of site-specific hazards and needs for medical surveillance of workers. E. Integrates the emergency management program needs to mitigate possible catastrophic incidents. F. Provides a reliable basis for evaluating program effectiveness and for making improvements.

Schedule Impact: None. The implementation of DOE Order 440.1A integrates the worker protection team into the initial stages of projects. This will actually reduce the work load on project managers, who will not have to expend time and effort seeking out individual worker protection team members to request support or evaluate potential hazards, as they are included at the beginning of new and ongoing work.

Impact if Change not made: into its management program it shows that DOE/NV is non-compliant with DOE Headquarters guidance. EH-2 is using ISMS as the standard by which all worker protection programs are judged. DOE 440.1A is the heart of current mainstream DOE/NV ISMS programs. The primary impact of not implementing DOE 440.1A is that "roles and responsibilities" cannot clearly be defined, thus violating the first principle of ISMS. Without having this key order to implement ISMS, DOE/NV and the contractor will continue to struggle to effectively comply with the DOE Policy on ISMS. If DOE/NV does not implement this EH-2 recommended change

See Attachment 1.

WBS: **Standard Number:** DOE O 440.1A

Baseline Change Request Log

BCR: 1999-004 Incorporate DOE Order 452.1A Nuclear Explosive and Weapons Surety Program and DOE/NV Order 452.1A, CRD into BN and WSI contracts

Approval Date: 8/26/1999

Disapproved:

Description: DOE O 452.1A, Nuclear Explosive and Weapons Surety Program, is the DOE Directive that establishes DOE-wide requirements on the Nuclear Explosive and Weapons Surety Program, and cancels DOE O 452.1. DOE O 452.1A does not include a Contractor Requirements Document. The A revision of the Order replaces the initial Order.

DOE O 452.1A, Nuclear Explosive and Weapons Surety Program, is a local DOE/NV Directive that establishes DOE/NV's nuclear explosive and weapons surety program requirements for the Stockpile Stewardship program activities and cancels DOE/NV 5610.10. The DOE/NV O 452.1A Contractor Requirements Document (CRD) defines the current local requirements applicable to contractor and national laboratories.

PROPOSED ACTION FOR CRG: 1) The CRG recommend that DOE O 452.1A and DOE/NV O 452.1A, CRD, be added to the Bechtel Contract, Section J, Appendix I, List 2 (DOE Directives Applicable to Activities not Included in the Necessary and Sufficient Process) and List B3 (DOE Directives Applicable to Device Assembly Facility) by the Contracting Officer, NV. Also delete predecessor Order 452.1 from List B2 and B3 and DOE Order 5610.10 from List B3 from the BN contract.

2) The CRG recommend that DOE O 452.1A and DOE/NV O 452.1A, CRD, be added to the WSI Contract, Section J, Attachment D, List B2, DOE Directives Applicable to Activities not Included in the Necessary and Sufficient Process, and List B3, DOE Directives Applicable to Device Assembly Facility by the Contracting Officer, NV. Also delete predecessor Orders DOE O 452.1 from List B2 and B3 from the WSI contract.

Since Nuclear Explosive and Weapons Surety Program was exempt from the WSS process initially, these Orders are not proposed for addition to DOE/NV WSS at this time. They should be considered for inclusion in DOE/NV WSS in the future, when the exemptions for nuclear explosive safety and device assembly/disassembly activities from WSS are re-evaluated for possible elimination.

CURRENT STATUS OF IMPLEMENTATION: DOE/NV organizational elements, contractors, and national laboratories are currently required to implement the predecessor DOE Order 452.1, and DOE/NV 5610.10A, Nuclear Explosive and Weapons Surety Program. The DOE O 452.1A (no CRD) and DOE/NV Order 452.1A CRD are new Directives established for implementation. These Directives replace the canceled DOE Order

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452.1 and canceled DOE/NV 5610.10A (predecessor of DOE/NV O 452.1A and CRD). The new Orders establish a current set of requirements for nuclear explosive and Weapons Surety Program activities.

WSS Documentation: The activities covered by this Order are exempt from WSS; therefore, no WBS description and identification of hazards are appropriate, at this time.

Justification: There are no laws or regulations that address all the specific DOE established safety requirements specified in the DOE and DOE/NV Orders on nuclear explosive and Weapons Surety Program activities for use on DOE/NV contracts where applicable. The DOE O 452.1A and the DOE/NV 452.1A Directive, CRD, provides the current requirements considered necessary and sufficient, assuming reasonable implementation by national laboratories and DOE/NV contractors, to protect the public, the worker and the environment from potential adverse consequences from nuclear device testing activities and operations.

Cost Impact: Not an issue.

Schedule Impact: Not an issue.

Impact if Change is not made: The most current DOE-wide and local DOE/NV Nuclear Explosive and Weapons Surety Program requirements considered necessary and sufficient for nuclear explosive operations, nuclear explosive safety, and activities at device assembly facilities would not be included in appropriate contracts (BN and WSI). This could be confusing and compromise safety.

NOTES for reference purpose: Bechtel Contract: The predecessor DOE O 452.1 IS LISTED in the BN contract on List B2 (work exempt from WSS) and is NOT LISTED on the B3 list (Directives Applicable to DAF). The predecessor DOE/NV Order 5610 Nuclear Explosive and Weapons Safety Program, is NOT LISTED in the BN contract on the B2 and IS LISTED on the B3 List.

WSI Contract: The predecessor DOE O 452.1 IS LISTED on List B2 (Work Exempt from WSS) and NOT LISTED on List B3 (applicable to DAF). DOE Order 5610.10 is not listed on the B2 or B3 list of the WSI contract.

Attachments: DOE O 452.1A, Nuclear Explosive and Weapons Surety Program (no CRD included) dated 1/17/97; and DOE/NV O 452.1A, Nuclear Explosive and Weapons Surety Program, including CRD, Attachment 1 (not dated, currently in DMC review).

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WBS: B2	Standard Number: DOE O 452.1A
WBS: B2	Standard Number: NV O 452.1A, CRD
WBS: B3	Standard Number: NV O 452.1A, CRD
WBS: B3	Standard Number: DOE O 452.1A
WBS: B3	Standard Number: DOE O 5610.10

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BCR: 1999-003 Incorporate DOE O 452.2A, Safety of Nuclear Explosive Operations and DOE/NV O 452.2A, CRD into BN and WSI contracts

Approval Date: 8/26/1999

Disapproved:

Description: DOE O 452.2A, Safety of Nuclear Explosive Operations, is the DOE Directive that establishes DOE-wide requirements on the nuclear explosive safety program, and cancels DOE O 452.2. DOE O 452.2 does not include a Contractor Requirements Document. The A revision of the Order replaces the initial Order.

DOE/NV Order 452.2A, Safety of Nuclear Explosive Operations, is a local DOE/NV Directive that establishes DOE/NV's nuclear explosive safety (NES) requirements for the Stockpile Stewardship program and cancels DOE/NV 5610.11A. The DOE/NV O 452.2A Contractor Requirements Document (CRD) defines the current local requirements applicable to contractor and national laboratories.

PROPOSED ACTION FOR CRG: 1) The CRG recommend that DOE O 452.2A and DOE/NV O 452.2A, CRD, be added to the Bechtel Contract, Section J, Appendix I, List B2 (DOE Directives Applicable to Activities not Included in the Necessary and Sufficient Process) and List B3 (DOE Directives Applicable to Device Assembly Facility) by the Contracting Officer, NV. Also delete predecessor Order 452.2 from List B2 and B3 and DOE Order 5610.11 from List B3.

2) The CRG recommend that DOE O 452.2A and DOE/NV O 452.2A, CRD, be added to the WSI Contract, Section J, Attachment D, List B2 (DOE Directives Applicable to Activities not Included in the Necessary and Sufficient Process) and List B3 (DOE Directives Applicable to Device Assembly Facility by the Contracting Officer, NV. Also delete predecessor Orders DOE O 452.2 from List B2 and B3.

Since Nuclear Explosive Safety and Assembly and Disassembly of nuclear explosives were exempt from the WSS process initially, these Orders are not proposed for addition to DOE/NV WSS at this time. They should be considered for inclusion in DOE/NV WSS in the future, when the exemptions for nuclear explosive safety and device assembly/disassembly activities from WSS are re-evaluated for possible elimination.

CURRENT STATUS OF IMPLEMENTATION: DOE/NV organizational elements, contractors, and national laboratories are currently required to implement the predecessor DOE Order 452.2, and DOE/NV 5610.11A, Safety of Nuclear Explosive Operations. The DOE O 452.2A (no CRD) and DOE/NV Order 452.2A CRD are new Directives established for implementation. These Directives replace the canceled DOE Order 452.2 and canceled DOE/NV 5610.11A (predecessor of DOE/NV O 452.2A). The new Orders establish a current set of

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requirements for nuclear explosive safety.

WSS Documentation: The activities covered by this Order are exempt from WSS; therefore, no WBS description and identification of hazards are appropriate, at this time.

Justification: There are no laws or regulations that address all the specific DOE established safety requirements specified in the DOE and DOE/NV Orders on nuclear explosive safety. The DOE O 452.2A and the DOE/NV 452.2A Directive, CRD, provides the current requirements considered necessary and sufficient, assuming reasonable implementation by national laboratories and DOE/NV contractors, to protect the public, the worker and the environment from potential adverse consequences from nuclear device testing activities and operations.

Cost Impact: Not an issue.

Schedule Impact: Not an issue.

Impact if Change is not made: The most current DOE-wide and local DOE/NV nuclear explosive safety requirements considered necessary and sufficient for nuclear explosive operations, nuclear explosive safety, and activities at device assembly facilities would not be included in appropriate contracts (BN and WSI). This could be confusing and compromise safety.

NOTES for reference purpose: Bechtel Contract: The predecessor DOE O 452.2 IS LISTED in the BN contract on List B2 (work exempt from WSS) and is NOT LISTED on the B3 list (Directives Applicable to DAF). The predecessor DOE/NV Order 5610 Nuclear Explosive and Weapons Safety Program, is NOT LISTED in the BN contract on the B2 and IS LISTED on the B3 lists.

WSI Contract: The predecessor DOE O 452.2 IS LISTED on List B2 (Work Exempt from WSS) and NOT LISTED on List B3 (applicable to DAF). The predecessor DOE/NV Order 5610.10 Nuclear Explosives and Weapons Safety Program, is NOT LISTED in the WSI contract on the B2 or B3 lists.

Attachments: DOE O 452.2, Safety of Nuclear Explosive Operations, dated 1/17/97; and DOE/NV 452.2A, Safety of Nuclear Explosives Operations, including CRD, Attachment 1 (not dated, currently in DMC review).

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WBS: R2 **Standard Number:** NV O 452.2A, CRD

WBS: R2 **Standard Number:** DOE O 452.2A

WBS: R3 **Standard Number:** DOE O 452.2A

WBS: R3 **Standard Number:** NV O 452.2A, CRD

BCR: 1999-002 Supplementing of O 232.1A for with Order NV O 232.1A Occurrence Reporting

Approval Date: 9/23/1999

Disapproved:

Description: The originators would then like to add "NV O 232.1A Occurrence Reporting and Processing of Operations Information" to the Section 3 - Standards and Requirements. Doing so will establish the criteria and mechanisms required to report significant events and accidents to DOE/NV.

The originators would then like to delete the requirement imposed on the contractor in Order 232 to report events to DOE/HQ.

Justification: This change will establish DOE/NV's role in the occurrence reporting chain. The current Order places requirements to report accidents to DOE, but no necessarily to DOE/NV.

Impact on Project/Program: Instituting this requirement will relieve the contractor of reporting accidents to DOE/HQ. It will instead require them to report the accident to DOE/NV, and they place on us on DOE/NV to communicate with DOE/HQ. The same level of hazard mitigation as provided by the current contract is expected.

Cost Impact: Costs associated with local reporting are the same as with reporting to DOE/HQ.

Schedule Impact: None.

Attachments: The original WBS 2.10 is attached.

WBS: 2.10 **Standard Number:** NV O 232.1A

Baseline Change Request Log

BCR: 1999-001 **Gifts of Property for Education - Addition of NV O 44XD.1**

Approval Date: 11/5/1998

Disapproved:

Description: The originator requests that the following be added to the Section 2 - Hazards and Management issues of the WBS 1.3.6: Management has made the decision that personal property may be given as gifts, provided certain requirements are met, to educational institutions. This is in response to the Department of Energy's desire to foster the scientific and technical education of students.

The originators would then like to add "NV O 44XD.1 Gifts of Personal Property in Support of Mathematics and Science Education" to the Section 3 - Standards and Requirements. Doing so will establish the criteria and mechanisms required by the change in Management Issues.

Justification: This change will establish the authority of DOE/NV and it's contractors to make gifts of personal property to school districts which have a memorandum of understanding with DOE/NV. It limits the type of gifts so that this program cannot be used to circumvent the requirements already established in WBS 1.3.6.

Impact on Project/Program: It is believed that this requirement will satisfy the Manager's desire to make some equipment available for educational use.

Cost Impact: Current standards require us to go through a Federal Excess Process. These items would be made available to other Federal Agencies either free of charge, or for minimal financial consideration (usually up to 10% of the salvage value). Making these items a gift will cause us to forgo this profit.

Schedule Impact: None.

Attachments: The original WBS 1.3.6 is attached.

WBS: 1.3.6 **Standard Number: NV O 44XD.1**

Baseline Change Request Log

BCR: 1998-014 Addition of Work Breakdown Structure Element 1.8 - Administrative Systems & Controls

Approval Date: 12/17/1998

Disapproved:

Description: This change seeks to add a WBS elements which captures the administrative systems and controls needed to operate the Operations Office. The description of Work, hazards, and Issues, as well as the standards and justification are captured in the attached Format 1.

Cost Impacts: The suggested changes do involve the creation of managing boards and require the establishment of formalized reporting. There are costs associated with each item that would not be realized without the item. Actual dollar costs have not been calculated.

Schedule Impacts: None.

WBS: 1.8 Standard Number: NV M 410.X

WBS: 1.8 Standard Number: NV M 412.X

Baseline Change Request Log

BCR: 1998-013 Information Services Management & Planning

Approval Date: 4/28/1999

Disapproved:

Description: The proposed changes consolidates three separate information Service WSS WBSs, and adds or deletes standards. These WBS are: 1.4.1 Asset Management & Planning; 1.4.3 Software Applications, and 1.4.6 Data. The current WBS structure tends to reflect organizational structure vice a description of business process governed by common standards.

Justification: The work description formats of the three WBSs are duplicative and overly wordy. Consolidation of the three WBSs under the single 1.4 title will streamline the IS WBS structure and more accurately reflect industry practices, requirements, and processes for these WBSs. Additionally, recommend two data standards be added and three be deleted.

DELETE: 15 USC 271.

ADD: 15 USC Chapter 7, Subsection 271 - 278g-3/ Note: Establishes the NIST as the Federal focal point for developing standards and quality assurances practices for computer systems.

DELETE: 40 USC 759, Computer Security Act of 1987. Act repealed.

ADD: Appendix III, Office of Management and Budget (OMB) circular No. A-130. Note: Establishes policy for Federal information resources.

ADD: National Institute of Science & Technology (NIST) General Accepted Principals and Practices for Securing Information Systems. Note: Contains data management requirements.

Rationale: these documents contain information resources policy and data management function practices.

DELETE: American National Standards Institute (ANSI x3.135), Database Language SQL.

Rationale: Standard is voluntary and applicable to software developers.

DELETE: FIPS 193, Automation.

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Rationale: Voluntary standard applicable to software developers.

Cost Impact: No specific cost increases or savings can be related to these changes; however, some intangible savings, cost avoidance or management efficiencies may result from consolidating the three functions into a single WBS.

Schedule Impact: No specific schedule impacts are related to this change.

Impact if Change is not Made: The three IS functions will remain separate. Incorrect standards and requirements will continue to be associated with the data activity. Resources could be expended unnecessarily. Unnecessary confusion could result.

Attachment: Revised Work Activity Statement for the proposed new WBS 1.4.

WBS: 1.4	Standard Number: FIPS 193
WBS: 1.4	Standard Number: 15 USC 271
WBS: 1.4	Standard Number: 40 USC 479
WBS: 1.4	Standard Number: 15 USC Chapter 7, Section 271 - 278g-3
WBS: 1.4	Standard Number: American National Standards Institute (ANSI) x3.135
WBS: 1.4	Standard Number: OMB Circular No. A-130
WBS: 1.4	Standard Number: National Institute of Science & Technology (NIST)

Baseline Change Request Log

BCR: 1998-012 Incorporate DOE/NV Order 470.X, Intruder Interdiction, into WSI's Contract

Approval Date: 4/28/1999

Disapproved:

Approved 4-28-99, but needs signature.

Description: NV O 470.X will re-establish formal procedures contained in canceled NTS-SOP 5615, Intruder Interdiction, which directed the protective force and M&O contractors' activities in preventing intruders from obstructing programmatic activities, particularly event-related operations. The canceled NTS-SOP 5615 has been used in performing intruder interdiction activities since March 1996. It is proposed that this Directive and its CRD, when approved, be added to Attachment D of the WSI Contract to establish necessary and sufficient interdiction activities in support of subcritical experiments.

Since subcritical experiments were exempt from WSS, the detection and prevention of intruders associated with these experiments was not considered for inclusion in the WSS.

Justification: Currently, there is no Directive which addresses specific intruder interdiction activities for subcritical experiments. The Directive will provide requirements necessary and sufficient to detect and/or prevent intruders from impacting on the safety and security of programmatic activities in support of Subcritical Experiments.

Although the canceled NTS-SOP 5615 is being followed, there are no formal, written procedures in place for intruder interdiction activities. Once approved, this Order should be added to the set of standards in the WSI contract that was not considered in the WSS. It should also be added to List B of the WSS.

Impact on Project/Program: None.

Cost of Impact: None.

Schedule Impact: None.

Attachments: Draft NV Order 470.X.

WBS: 3.7 **Standard Number:** NV O 470.X

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WBS: R2 **Standard Number:** NV O 470.X, CRD

WBS: R2 **Standard Number:** NTS-SOP 5615

BCR: 1998-011 **Safety of Nuclear Explosive Operations**

Cancelled due to erroneous use of BCR.

Approval Date:

Disapproved:

WBS: **Standard Number:**

BCR: 1998-010 **Revised Charter to Incorporate National Labs Reps**

CANCELED.

Approval Date:

Disapproved:

Erroneous use of BCR to get concurrence on change to charter

WBS: **Standard Number:**

BCR: 1998-009 **Device Assembly Facility**

CANCELED.

Approval Date:

Disapproved:

Erroneous use of BCR to present DAF Transition Plan

WBS: **Standard Number:**

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BCR: 1998-008 Proposal to Add DOE/NV M 450.X, Authorixation Agreements for Facilities and Operations, to DOE/NV WSS, and BN and WSI Contracts

Approval Date: 8/6/1998

Disapproved:

Description: DOPE/NV M 450.x, Authorization Agreements for Facilities and Operations for Facilities and Operations, is a draft Directive that establishes the requirements and local process instructions for development of DOE/NV Authorization Agreements. Authorization Agreements are required for Category 1 and 2 nuclear facilities and other facilities as determined by the Manager, DOE/NV. The Directive provides definitions and defines requirements and responsibilities for DOE/NV federal employees and includes appropriate contractor requirements in a Contractor Requirements Document (Attachment 1). This Manual instruction also provides a format for DOE/NV Authorization Agreements (Attachment 2) and a means to define roles and responsibilities for facilities (Attachment 3 of the Directive). This Directive serves as DOE/NV's Tailored approach to application of Authorization Agreements to DOE/NV facilities/activities.

CURRENT STATUS OF IMPLEMENTATION: This draft Manual instruction is currently being implemented by AMNS in support of a DOE/NV Task Force, Lead by the Deputy Manager, DOE/NV and Project Managers. The Manager, DOE/NV, requested improved definition of roles and responsibilities at certain DOE/NV facilities. The Deputy Manager was tasked to initiate this improvement action, using a Task Forces of DOE/NV and participant organization representatives. DOE/NV staff in support of the Task Force developed the draft Manual instructions. Draft Authorization Agreements have been envelopment in by DOE/NV Project Managers, are being considered for final comments, and are expected to be processed for signature in the near future. DOE/NV Authorization Agreements currently in draft are for the UIA Complex (UIA0, Device Assembly Facility (DAF), DSWA Tunnel Complexes, Big Explosives Experimental Facility (BEEF), Hazardous Materials (HAZMAT) Spill Center, and Radioactive Waste Management Sites (RWMS). These Authorization Agreements have served as a pilot effort to ensure the DOE/NV Manual instruction is clear and understandable by staff and the resulting product (Authorization Agreements) meet the requirements and management's expectations.

WSS DOCUMENTATION: A WBS element will need to be developed for incorporation of this Directive against a description of work and a safety hazard and management issue. The issue is primarily a management issue of establishment of the DOE basis for allowing a significant risk facility to operate, and documenting the safety basis of requirements specifically applicable to a facility or operation. The safety issue is one of establishing clear understanding of the operational requirements and clear lines of responsibility and authority. A Format 1 document will need to be prepared if this proposal is accepted and the Directive is to be included in WSS and contracts, so adequate documentation exists for effective control of WSS.

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DRAFT DOE/NV DIRECTIVE; The draft Directive and attached CRD may change slightly in content in the final DMC review process. However, conceptually, it is believed that the draft Directive is in sufficient detail to accomplish review action by the CRG. The CRG can determine that the CRD requirements are appropriate for inclusion into appropriate contracts. The final CRD will be incorporated into the contract after the Manager approves the Directive for implementation. The DOE/NV Assistant Managers and Deputy Manager (members of the CRG) will have a final opportunity to review the Directive, including the CRD prior to review and signature of the Manager, NV.

Justification: Authorization Agreements are document DOE/HQ has established as a requirement by definition, for Category 1 and 2 nuclear facilities (DOE currently has no Category 1 or 2 facilities). Three DOE/NV facilities are of interest to the Defense Nuclear Facility Safety Board (DAF, UIA, and RWMS). DOE/NV was requested to establish schedules for the development of Authorization Agreements for these three facilities Richard Crowe, DOE/HQ Safety Management Implementation Team Leader. The Manager, DOE/NV, directed staff to prepare Authorization Agreements for certain DOE/NF facilities (UIA, DAF, DSWA Tunnel Complexes, BEEF, HAZMAT Spill Center).

DOE/NV actually did not have facilities of a hazard nature (categorization) upon which DOE/HQ mandates a requirement for establishment of Authorization Agreements. This Manual instruction was prepared to service as DOE/NV's local tailored approach to a standard for DOE/NV Authorization Agreements, which meets the needs of DOE/NV.

The Authorization Agreement Format (Attachment 2) consists of a tailoring of DOE G 450.4-1, Integrates Safety Management System Guide, and DNFSB/TECH-19.

The Responsibility Matrix was developed by the Task Force (a team effort of representatives of Authorization Agreement party organizations), which had members from the DOE/NV, DOE/NV Contractors, National Laboratories, and other federal agencies.

Mike Marelli, Mitch Kunich, and Edna White in support of the Deputy Manager's Task Force developed the Manual instructions.

DOE/NV 450.X conforms to the new Directives Policy P 251.1 regarding supplemental Directives, Work Smart

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Standards, and Contractor Requirements Documents.

Cost Impact: Not at issue.

Schedule Impact: Not at issue.

Impact if Change is not Made: Confusion may result on implementation of DOE requirements, format and content of Authorization Agreements without a DOE/NV tailored approach to Authorization Agreements established in the DOE/NV Directives and incorporated in appropriate contracts as a WSS.

Attachments: Copy of Draft NV M 450.x, hand dated 7/27/98.

WBS: **Standard Number:** NV M 450.X, CRD

WBS: B2 **Standard Number:** NV M 450.X, CRD

WBS: B3 **Standard Number:** NV M 450.X, CRD

Baseline Change Request Log

BCR: 1998-007 Incorporate DOE/NV Order 56XH.1, CRD, Subcritical Experiment Safety Program, Into BN and WSI Contracts

Approval Date: 8/6/1998

Disapproved:

Description: DOE/NV Order 56XH.1, Subcritical Experiment (SCE) Safety Program, includes a Contractor Requirements Document (CRD), and is a draft local DOE/NV Directives which will establish DOE/NV safety requirements on Elements of DOE/NV, National Laboratories, and NV contractors. This DOE/NV Directive serves as an integral part of the safety management system for work assigned to DOE/NV participants (DOE/NV organizational elements, National Laboratories, Bechtel Nevada, Inc., and WSI) on subcritical experiments.

PROPOSED ACTION FOR CRG: Upon approval of the Directive by the Manager, NV, the CRD be recommended to the Contracting Officer, NV, to be added to the Bechtel Nevada Contract, Section J., Appendix I, List B2, DOE Directives Applicable to Activities not included in the Necessary and Sufficient Process.

It is also proposed that the 56XH.1, CRD, be added to the WSI contract, Appendix D, DOE Directives or the Security Services contract, once the successful bidder is decided.

Since subcritical experiments (Energetic experiments with SNM) were exempt from WSS, the CRD attached to this Order is not proposed for addition to the DOE/NV WSS at this time. It should be considered for inclusion in DOE/NV WSS in the future, when the exemptions to WSS are re-evaluated for possible elimination.

CURRENT STATUS OF IMPLMENETIATION: DOE/NV and SCE participant organizations currently implement a draft version of this DOE/NV Order. The attached draft directive is in the new Directives format and includes a CRD. The draft directive is currently in the final review process of the Directives Management Center for Manager, NV, approval.

This Directive was not in existence at the time when WSS were being established and initial lists of DOE Directives were established for the Bechtel Nevada contracts.

DRAFT DIRECTIVES: The draft directive and attached CRD may change slightly in content in the final DMC review process. However, conceptually, it is believed that the draft directive is in sufficient detail to accomplish review action by the CRG. The CRG can be determined that the CRD requirements are appropriate for inclusion into appropriate contracts. The final CRD will be incorporated into the contract after the Manager approves the directive for implementation. The DOE/NV Assistant Managers and Deputy Manager (members of the CRG) will

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have a final opportunity to review the Directive, including the CRD prior to review and signature of the Manager, NV.

Since subcritical experiments (energetic experiments with SNM) were exempt from WSS, this order CRD is not proposed for addition to DOE/NV WSS at this time. It should be considered for inclusion in DOE/NV WSS in the future, when the exemptions to WSS are re-evaluated for possible elimination.

Justification. There are no Laws, regulations, or DOE Directives, which address the specific safety requirements specified in the DOE/NV Order for Subcritical Experiments. The CRD in this DOE/NV Directive provides the requirements considered necessary and sufficient by DOE/NV management, assuming reasonable implementation by national laboratories and DOE/NV contracts, to mitigate adverse consequences to the worker, the public, and the environment.

Cost Impact: Not at issue.

Schedule Impact: Not at issue.

Impact if Change is not Made: Confusion from lack of documented requirements and controls incorporated into contracts.

Attachments: DOE/NV Order 56XH, Draft dated 7/24/98.

WBS: B2

Standard Number: NV O 56XH.1, CRD

Baseline Change Request Log

BCR: 1998-006 Incorporate DOE/NV Order 56XG.1, Chg 1, Subcritical Experiments, CRD, Into BN amd WSI Contracts

Approval Date: 10/15/1998

Disapproved:

Description: DOE/NV Order 56XG.1, Subcritical Experiments, is a local DOE/NV Directive which establish DOE/NV programmatic and operational requirements for subcritical experiments. This DOE/NV Directive serves as an integral part of the operational management system for DOE/NV participants (DOE/NV organizational elements, National Laboratories, Bechtel Nevada, Inc., and WSI) on subcritical experiments. DOE/NV Order 56XG.1 Chg 1 has defined contractor requirements in a Contractor Requirements Document (CRD), as Attachment 1, to the Order at the request of the WSS-CRG.

PROPOSED ACTION FOR CRG: The DOE/NV Order 56XG.1, Chg 1, CRD be recommended by the CRG to the Contracting Officer, NV, to be added to the Bechtel Contract, Section J, Appendix I, List B2, DOE Directives Applicable to Activities Not Included in the Necessary and Sufficient Process.

Since subcritical experiments (energetic experiments with SNM) were exempt from WSS, this order is not proposed for addition to DOE/NV WSS at this time. It should be considered for inclusion in DOE/NV WSS in the future, when the exemptions to WSS are re-evaluated for possible elimination.

It is also proposed that the Directive be added to the WSI contract, Appendix D, DOE Directives and the Security Services contract, once the successful bidder is decided.

CURRENT STATUS IM IMPLEMENTATION: DOE/NV and SCE participants currently implement the existing NV Order. Change 1 to the Order provides clarification of the requirements applicable to DOE/NV contractors and national laboratories in a CRD. No other changes of substance were made to the Order, and information may be repeated in the CRD for clarification purposes. This change action is necessary to get the CRD related to the existing Order, which is currently being implemented by participants, in appropriate contracts for work initially exempted form the WSS process.

N&S (WSS) DOCUMENTATION: The activities covered by this order are exempt form WSS; therefore, no WBS description or identification of hazards are appropriate, at this time.

Justification: There are no Laws, regulations, or DOE Directives, which address the specific operations requirements specified in this DOE/NV Order for Subcritical Experiments. This Directive was not in existence, at

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the time, when WSS were being developed at DOE/NV and the initial contract lists of DOE Directives were established for the Bechtel Nevada Contract. This DOE/NV Directive provides the requirements considered necessary and sufficient by DOE/NV management, assuming reasonable implementation by national laboratories and DOE/NV contractors, to mitigate adverse consequences to the worker, the public, and the environment.

The requirements in the CRD of this Order are currently implemented by involved organizations.

Cost Impact: Not at issue.

Schedule Impact: Not at issue.

Impact if Change is not Made: Confusion from lack of documented requirements and controls incorporated in contracts.

Attachments: DOE/NV Order 56XG.1, Chg 1 (document in DMC review).

WBS: B2

Standard Number: DOE O 56XG.1, Chg 1, CRD

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BCR: 1998-005 W.B. S. # 2.1.7 Low Level Waste

Approval Date:

Disapproved:

CANCELED.

Description: Appendix D of the Necessary and Sufficient Standards identifies NRC Standard 10 CFR 61 as the applicable standard to low-level waste management but does not identify DOE Order 5820.2A, "Radioactive Waste Management," and its subsequent revisions as acceptable alternatives. It is requested that DOE Order 5820.2A be identified in Appendix D of the contract document as an acceptable alternative to Necessary and Sufficient Standards for performing work related to Radioactive Waste Management.

Justification: Major differences exists between NRC requirements and DOE Order 5820.2A on the management of low-level radioactive waste (see Attachment #1).

Cost Impact: Hundreds of thousands of dollars will be required to bridge the gap between NRC requirements and DOE Order 5820.2A. These costs will involve the revision of existing documents; operational changes; and waste acceptance criteria modifications for both on site and off site generators.

Schedule Impact: None.

Impact if Change is not Made: NTS will operate under a different set of criteria from other DOE facilities; requirements imposed by new DOE Order 435.1 will not be adhered to since similar directives do not exist under NRC; NTS will be out of compliance with DNFSB expectations; the state may assume right to regulate NTS low-level waste operations.

Attachments: See Attachment #1.

WBS: 2.1.7 Standard Number: DOE O 5820.2A

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BCR: 1998-004 W.B.S. #2.1.6 Mixed Waste

Approval Date:

Disapproved:

CANCELED.

Description: Appendix D of the Necessary and Sufficient Standards for mixed waste does not identify DOE Order 5820.2A, "Radioactive Waste Management," as a standard applicable to the management of mixed waste. Waste management is requesting that DOE Order 5820.2A be identified, along with the currently existing standards for the management of mixed waste.

Justification: None of the standards listed in the Necessary and Sufficient guidelines contains requirements or guidelines for the storage and disposal of mixed waste. These standards are found only in DOE Order 5820.2A.

Cost Impact: There is no direct cost impact associated with the request.

Schedule Impact: None.

Impact if Change is not Made: This will result in a direct violation of a DOE Order that governs the storage and disposal of mixed waste. DOE/NV will fail to implement both existing requirements by DOE Order 5820.2A and those mandated by DOE Order 435.1 that will soon be published.

Attachments: DOE Order 5820.2A, Chapter III, Section 2d, and Chapter VI-2; VI-3©.

WBS: 2.1.6 Standard Number: DOE O 5820.2A

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BCR: 1998-003 WBS 4.8, Emergency Management Program and System

Approval Date: 5/4/1999

Disapproved:

BCR 1998-003Alt replaced BCR 1998-003.

Description: This change proposes that the laws and regulations identified in DOE O 151.1 and some of the requirements of the DOE O 151.1, Contract Requirements Document (CRD), be adopted as the DOE/NV Complex-wide Work Smart Standard for Emergency Management Program and System WBS 4.8.

The Order cites the applicable federal laws and regulations. Attachment 1 to the Order, the CRD, identifies certain additional DOE requirements for contractors, that should be considered DOE/NV complex-wide WSS. The applicable laws and regulations should be considered included in List A of the BN and WSI contracts. DOE O 151.1 CRD should be considered included in List Bs where appropriate as the WSS by reference to this change and revised Format 1 (attached to this change request) to the N&S Closure Process, Final Report, Volume 1, Appendix D, cited in the BN and WSI contracts.

Background: As a part of the initial Work Smart Standards process implementation by DOE/NV's NISCG, Emergency Management Program and System, WBS 4.8 was established. The work activity, hazards, management issues were identified on the initial Format 1; however, the standards section was left in a stage of "to be determined" in the DOE/NV NISCG Final Report. Subsequently, BN prepared a revised Format 1 for WBS 4.8, Emergency Management, and a Baseline Change Request (98-003); however the change as proposed was not acceptable to the DOE/NV Director, Emergency Management Division. Therefore, this Baseline Change Request was prepared for considered as an alternative to the BN BCR 98-003.

It should be noted that DOE O 151.1, CRD, was identified as a mandatory Directive in the BN and WSI contract under List B2, Directives applicable to activities not included in the N&S process. DOE O 151.1 (without mention of the CRD) was included as mandatory for the Device Assembly Facility in the Facility Specific Order Compliance Self-Assessment. Higgs memo, DAF-97-CORR-0295, dated March 17, 1997, and the DAF Activity Agreement which was issued for implementation January 14, 1999 (valid need). However DOE Order 151.1 (no mention of the CRD) was not included on List B3 (Orders applicable to categorization of events under Occurrence Reporting, WBS 2.10.

Proposed actions for the CRG: Accept this proposed change request.

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- a) By acceptance of this proposed change, the new Format 1 (attached) will service as the complex wide WSS. The attached Format 1 provides the red line changes to the initial Format 1 contain in the DOE/NV NISCG Final Report. The Attached Format 1 provides a more complete identification of the hazards and management issues, laws, regulations, DOE Orders, and implementation Considerations.*
- b) Recommend the Contracting Officer, DOE/NV modify the BN and WSI contracts to include the proposed Format 1 "by reference," i.e., Laws and regulations are a part of the List A; and DOE Directives are a part of List B1.*
- C) Reconfirm the List B2 for Exempt work, which includes O 151.1 CRD that is to remain as valid.*
- D) Recommend the Contracting Officer; DOE/NV, modify the List B3 for DAF to include the DOE O 151.1, CRD.*
- E) It is also recommend, as housekeeping measures, that the Contracting Officer, DOE/NV modify the BN and WSI contracts to delete DOE Order 5500.2, Emergency Categories, Classes, and Notification and Reporting Requirements; DOE 5500.3, Planning and Preparedness for Operations Emergencies; and 5500.10, Emergency readiness Assurance Program from the List B3 for DAF. These orders were canceled and replaced by DOE O 151.1 and, therefore, should be deleted from the contract.*

The proposed new Format 1 for WBS 4.8, Emergency Management Program and System as attached for review and use by the CRG.

Justification: In the initial and BN proposed Format 1s, the work activity description, hazards, and implementation considerations did not reflect the full scope of DOE/NV's Emergency Management Program and System. The EM Program and System should have included an Operational Emergency Hazardous Materials program and appropriate laws and regulations. It only reflected an Operational Emergency Base Program. It also failed to recognize that required major hazard assessments have identified possible emergencies at such locations as the Hazardous Materials Spill Center, DAF, and U1a which are expected to have consequences greater than that for an Operational Emergency Base Program. The description, therefore, fails to reflect all the work and expected hazards and DOE expectations beyond the Base Program, including Operational Emergency Hazardous Materials Program, Operational Emergency Events and Conditions, Energy Assistance Program, Communication Requirements, Public Affairs Policy and Planning Requirements, Evaluations and Readiness Assurance, and Program Administration.

The DOE/NV's Emergency Management Program and System is provided to support all organizations operating at facilities and locations under the purview of OE/NV and comply with all applicable federal, State, local, and DOE management requirements. The Contracting Officer is required to identify the DOE Directives

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requirements, when appropriate, in contracts per the DEAR. These requirements should be made binding whenever contractor or user personnel operate on DOE/NV sites and emergency management support is dependent on the DOE/NV Emergency Management program and system. All contractors are required to comply with applicable federal, State, and local laws, and regulations regardless of whether they are identified in the contract or not. For DOE/NV contracts, which include the DOE/NV Complex-wide WSS, the Laws and regulations are explicitly defined.

The initial Format 1 description also did not reflect the expectations that the DOE/NV has established in the DOE/NV Consolidated Emergency Management Plan (a DOE/NV implementing document). This implementing document was established to address the management of operational emergencies that could occur at all DOE/NV sites and facilities. This includes those on NTS and at outlying DOE/NV sites and facilities such as the North Las Vegas Facilities and Remote Sensing Laboratory at Nellis Air Force Base in the greater Las Vegas area, Nevada; the Special Technologies Laboratory in Santa Barbara, California, the Washington Aerial Measurement Operations at Andrews Air Force Base, Maryland; and facilities in Los Alamos, New Mexico.

In addition, BN operates the Emergency Response Organization for DOE/NV in accordance with contract scope requirements and the DOE/NV Consolidated Emergency Management Plan (a DOE/NV implementing document). The fundamental requirements for this plan come from DOE O 151.1 and CRD. The requirements are generally covered in the preamble to the CRD. These requirements are being implemented by BN for the benefit of all organizations working at the NTS.

For these reasons the laws and regulations and DOE O 151.1., CRD requirements, should be adopted as the DOE/NV complex-wide WSS for the entire DOE/NV complex and all facilities/operations/sites and organizations conducting work under the purview of DOE/NV.

The justification for recommending changes to List B3 is that the change to O 151.1, CRD, was made 3/17/97 for DAF by the Facility start up Manager, Richard Higgs, LANL, and the initial list B3, which predates the 3/17/97 list, was subsequently determined to be in error (DOE Order 151.1 was adopted as a DAF Basis Order and replaced DOE 5500.2, 5500.3, and 5500.10).

Cost Impact: Not in contention.

Schedule Impact: Not in contention.

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Impact if Change is not Made: Confusion will remain between personnel and where BN and WSI contracts specify laws, regulations, and DOE Directives regarding the standard WSS set for Emergency Management. Also the confusion will remain in contracts which require the O 151.1 on List B2 (for facilities no included in the N&S process), but do not require O 151.1 at DAF (an error) or in general use as a DOE/NV complex-wide WSS.

Attachments: Attached is a new proposed Format 1, WBS 4.8 Emergency Management.

WBS: 4.8	Standard Number: DOE O 5500.10
WBS: 4.8	Standard Number: DOE O 5500.2
WBS: 4.8	Standard Number: DOE O 5500.3
WBS: 4.8	Standard Number: DOE O 151.1, CRD, Paragraphs 1-6 and 8-13
WBS: B2	Standard Number: DOE O 151.1, CRD, Paragraphs 1-6 and 8-13
WBS: B3	Standard Number: DOE O 151.1, CRD, Paragraphs 1-6 and 8-13

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BCR: 1998-003 W.B.S. 4.8 Emergency Management Program and System

Approval Date:

Disapproved:

Canceled and replaced by 1998-003Alt.

Description: As part of the DOE/NV Necessary and Sufficient Closure Process, the codes and standards for an Emergency Management Program and System were "To Be Determined." Bechtel Nevada has identified the following as the appropriate standards for an emergency Management Program and System, that if properly implemented would provided adequate protection of the worker, public, and environment.

Codes/Standards:

RESPONSIBILITIES: DOE Order 151.1 - Change 2 - CRD - Comprehensive Emergency Management System. Paragraph #1 of the CRD requires implementation of a comprehensive Emergency Management Program commensurate with the hazards present.

OPERATIONAL EMERGENCY BASE PROGRAM: 29 CFR 1910.38 - Employee Emergency Plans and Fire Prevention Plans, Occupational Safety and Health Administration requirements for employee evacuation plans.

29 CFR 1910.165 - Employee Alarm Systems, Occupational Safety and Health Administration requirements for employee notification systems.

41 CFR 101-20.103-4 - Initiating Action Under Occupant Emergency programs, Federal property management regulations for occupant emergency programs.

41 CFR 101-20.105 - Smoking, Federal property management regulations for occupant accident and fire prevent.

44 CFR 302 - Civil Defense State and Local Emergency Management Assistance Programs, Federal Emergency Management Agency requirements for emergency operations plans for State and Local government that address similar hazards.

18 CFR 12.20 - General Requirements for Emergency Action Plans, Federal Energy Regulatory Commission requirements for emergency plans to protect the health and safety of members of the public (upstream and downstream of water projects and project works).

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40 CFR 100 series, Subpart D - Water Programs, Environmental Protection Agency requirements, implementing the Clean Water Act through the National Pollution Discharge Elimination System.

40 CFR 112 series - Oil Pollution Prevention, Requirements for contingency planning for oil spills, which mandate preparation of Spill Prevention Control and Countermeasure Plans.

40 CFR 141-142 - Clean Water Act, Environmental Protection Agency requirements implementing the provisions of the Safe Drinking Water Act.

40 CFR 300 series - Environmental Protection Agency Act, Environmental Protection Agency requirements including Title III implementing the comprehensive Environmental Response, Compensation, and Liability Act.

40 CFR 355 - Emergency Planning and Notifications, Environmental Protection Agency requirements implementing the Emergency Planning and Community Right-to-Know Act.

OPERATIONAL EMERGENCY EVENTS AND CONDITIONS: DOE Order 151.1 - Change 2 - CRD - Comprehensive Emergency Management System Paragraph #10 of the CRD requires ensuring of the proper identification notification, categorization, and reporting to the appropriate DOE entities.

PUBLIC AFFAIRS POLICY AND PLANNING REQUIREMENTS: DOE Order 151.1 - Change 2 - CRD - Comprehensive Emergency Management System Paragraph #12 of the CRD requires integration of emergency public information planning with the development and maintenance of the Emergency Plan.

EVALUATIONS AND READINESS ASSURANCE: DOE Order 151.1 - Change 2 - CRD - Comprehensive Emergency Management System Paragraph #15 of the CRD requires resolution of evaluation, appraisal, and assessment findings with the responsible organizations or request approval for an exemption to the requirements.

PROGRAM ADMINISTRATION: 20 CFR 1910.38 - Employee Emergency Plans and Fire Prevention Plans, Emergency plans requirements.

Justification: This change identifies the standards for this Work Activity.

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Cost Impact: The selected standards minimize the impact on cost by identifying the specific requirements for the Work Activity.

Schedule Impact: Currently no standards have been identified for this work activity.

Impact if Change is not Made: If the proposed standards are not accepted, a new set of standards will have to be identified and reviewed.

Attachments: No attachments.

WBS: 4.8	Standard Number: 18 CFR 12.20
WBS: 4.8	Standard Number: 44 CFR 302
WBS: 4.8	Standard Number: 40 CFR 141-142
WBS: 4.8	Standard Number: 40 CFR 355
WBS: 4.8	Standard Number: DOE O 151.1 Chg 2, CRD, Paragraphs 1, 10, 12, and 15
WBS: 4.8	Standard Number: 40 CFR 300 Series
WBS: 4.8	Standard Number: 40 CFR 112 Series
WBS: 4.8	Standard Number: 40 CFR 100 Series - Subpart D
WBS: 4.8	Standard Number: 41 CFR 101-20.103-4
WBS: 4.8	Standard Number: 41 CFR 101-20.105
WBS: 4.8	Standard Number: 29 CFR 1910.38

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WBS: 4.8 **Standard Number:** 29 CFR 1910.165

BCR: 1998-002 **W.B.S. 4.4 Radiation Protection**

Approval Date: 10/15/1998

Disapproved:

Description: Add DOE N 44.1 paragraph 6e for the controlled sealed radioactive sources.

Justification: This program is not covered nor addressed by 10 CFR 835.

Cost Impact: None. Program is already implemented.

Schedule Impact: N/A.

Impact if Change is not Made: No requirement would exist for contractors to maintain control fo their radioactive sources.

Attachments: None.

WBS: 4.4 **Standard Number:** DOE N 441.1 Paragraph 6e

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BCR: 1998-001 3.3 Aviation

Approval Date:

Disapproved: 4/30/1998

DISAPPROVED.

Description: DOE Aviation Safety Order, 440.2 was not listed as an order that had to be complied with in the most recent Modification to the Bechtel Contract (M024). See page 26 of 31.

Justification: Order 440.2 has to be in the Contract Modification because the Order requires an Aviation Implementation Plan for each Field Office to be annually approved by the Senior Aviation Official (EH-53). The Nevada Operations Office has Government owned aircraft; operated and maintained by the Contractor (Bechtel). The AIP outlines how we operate and maintain the aircraft. Part of the AIP, incorporated the RSL Operations Manual by reference. The Operation Manual is a living document.

Nevada Operations Office may or not be able to operate within the FAA regulations. In Those cases where we are required to operate outside the civil regulations, we require the contractor, Bechtel, to develop an Aviation Safety Document to assess the Risks so that we DOE can decide where to take that Risk or not. The AIP authorizes DOE/NV to direct the Contractor to perform missions using DOE aircraft.

The DOE Fleet is controlled by EH-53. They are the Headquarters unit that be tasked to oversee the entire DOE Fleet. The DOE Order 440.2, is a direct result of assigning responsibilities to DOE, from Headquarters down to the Field Office and further to the Contractor. It is a necessary link in the chain of command.

Cost Impact: Cost would climb due to the inability to perform some missions and those that are performed would require lengthy reviews by FAA. These review would drive up costs as the last link required in the approval before executing the mission. Our ability to be competitive would be in peril, therefore, driving up the hourly cost for service. The end result would be less flights, less pilots, less mechanics, less aircraft, and higher costs.

Schedule Impact: We will advice the Contractor, and pray that you will include the Aviation Safety Order as soon as possible as a mandatory Order in the Modified Contract with Bechtel.

Impact if Change is not Made: For the last three years, Bechtel has been complying with this order. The formation of and the responsibility given to EH-53 after the 1991 accident at NTS was the result having upper management involved in the operation of the DOE Fleet. Their marching orders are those found in Order 440.2

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as well as those of the Field Office and then to the Contractor. Without this Order, a valuable link in the chain of command is missing. Headquarters will have to resolve this if we do not make Order 440.2 as a mandatory order in the Contract with Bechtel.

Attachments: Order 440.2 and Aviation Implementation Plan.

WBS: 3.3

Standard Number: DOE O 440.2

BCR: 1997-005 **Incorporate Energy Management Requirements into the BN Contract**

Approval Date:

DISAPPROVED.

Disapproved: 4/30/1998

DOE O 430.2, In-House Energy Management, should be incorporated as an appropriate requirement into the BN contract beyond and above paragraph I. 110 DEAR 979.5204-60 Facilities Management, section (d) in order for DOE/NV to cost effectively meet or exceed all laws, Executive Orders, and Federal regulations for energy efficiency, use of renewable energy, and water conservation at Federal Facilities.

WBS: 1.9

Standard Number: DOE O 430.2

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BCR: 1997-004 3.6 Transportation Correction

Approval Date: 3/30/1998

Disapproved:

Add the following to the Standards: "The 49 CFR requirements are meant to apply to transportation in commerce. For transportation which is not in commerce, the contractor is expected to live within the spirit of the DOT regulations, and provide safe transportation (as would an industrial counterpart). Definition of the mechanisms to do this are the responsibility of the contractor."

This change clarifies the position of the identification team and ensures it's incorporated clearly in the standards.

The DOT regulations would apply onsite, in opposition of the opinion of the identification team.

- WBS: 3.6 Standard Number:** 15 CFR Parts 768 - 799
- WBS: 3.6 Standard Number:** NRS Title 43, Volume 33, Chapter 483.912
- WBS: 3.6 Standard Number:** 49 CFR Part 382 - 399
- WBS: 3.6 Standard Number:** 15 CFR Part 30
- WBS: 3.6 Standard Number:** Institute of Makers of Explosives (IME) Standard 22
- WBS: 3.6 Standard Number:** International Air Transport Association (IATA)
- WBS: 3.6 Standard Number:** International Civil Aviation Organization (ICAO)
- WBS: 3.6 Standard Number:** 10 CFR Part 71
- WBS: 3.6 Standard Number:** 40 CFR 260 - 263
- WBS: 3.6 Standard Number:** 49 CFR 171 - 183

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BCR: 1997-003 Transportation Standards Update

Approval Date:

Disapproved: 10/15/1998

DISAPPROVED.

Description: In 3.6 TRANSPORTATION/SECTION 3 - STANDARDS, add "DOE M 440.1-1 DOE Explosive Safety Manual."

In SECTION 5 - IMPLEMENTATION CONSIDERATIONS, change first sentence to read "DOE/NV Hazardous Materials Onsite Transportation Safety Manual for the NTS, DOE/NV 356, is available as a guide for on-site hazardous materials transportation except for explosive transportation which is governed by DOE M 440.1-1."

Justification: First and foremost the DOE Explosive Safety Manual is a mandatory DOE document and secondly, it contains the appropriate safeguards and requirements for on-site transportation of explosive material in greater detail than does NTS, DOE/NV 356 (which needs revision to be current with new regulations).

In SECTION 7 - UNCERTAINTIES OR ISSUES, delete the second sentence that states "It is uncertain if full DOT compliance is required on the NTS."

Justification: In SECTION 3, it states that the NTS is a private facility and DOT regulations are not applicable. Therefore, the current language in SECTION 7 is ambiguous.

Cost Impact: Could be considerable if only DOT regulations required on the NTS because of unnecessary requirements, documentation, other Agency involvement in decision process, etc.

Schedule Impact: Schedules could be impacted if only DOT required due to notification/exemption requirements that could take up to 45 days to complete.

Impact if Change not Made: Imposition of unnecessary and cumbersome DOT Transportation Requirements on NTS explosive transportation operations.

WBS: 3.6

Standard Number: DOE M 440.1-1

Baseline Change Request Log

BCR: 1997-002 Waste Explosive Disposal Standards Update

Approval Date: 10/15/1998

Disapproved:

Description: In 2.1.8 WASTE EXPLOSIVE DISPOSAL/SECTION 3 - STANDARDS, add "40 CFR 260 through 270 (Military Munitions Rule: Hazardous Waste Identification and Management; Explosive Emergencies, Manifest Exemptions for Transportation of Hazardous Waste on Right of Ways on Contiguous Properties; Final Rule).

Justification: EPA has been working on this 40 CFR 260 through 270 change since 1992 which was extensively reworked to accommodate operations that are fieldable both at NTS and TTR. This addition will enhance operations considerably.

Cost Impact: Not know, however, will allow most economical approach to waste explosive disposal operations.

Schedule Impact: None.

Impact if Change not Made: Waste explosive disposal operations conducted without full benefit of current law which could result in less efficient activities and/or code violations.

WBS: 2.1.8 **Standard Number:** 40 CFR 260 through 270

Baseline Change Request Log

BCR: 1997-001 Explosive Standards Update

Approval Date: 11/5/1998

Disapproved:

APPROVED Conditionally - Board accepted the portion of the change that asked to drop the International Makes of Explosives (IME) standards, but did not concur with the addition of the NTS-SOP. This was based on the SME's report, which indicated that he believed that the OSHA standards cited would provide adequate protection.

Description: In 3.12 EXPLOSIVE STORAGE/SECTION 3 - STANDARDS, delete reference to "Institute for Manufactures of Explosives (IME) Safety Library Publication No. 22" and add "NTS-SOP 5412 Explosive Safety."

Justification: IME Publication No. 22 is applicable to transportation of explosives but not storage. NTS-SOP 5412 Explosive describes explosive storage requirements.

Cost Impact: None.

Schedule Impact: None.

Impact if Change Not Made: Continue reference to non-applicable IME safety publication.

WBS: 3.12 Standard Number: NTS-SOP 5412

WBS: 3.12 Standard Number: IME Safety Library Publication No. 22